Central File Room Cross Reference Sheet

Record Series: AIR PA			
Primary Identification Number (Account / RN):	RN	100788959	
Secondary Identification Number (Permit):	Permit	7711A	APD Project 209744
Document Name / Building Materials C	orporati	on of America	CONFIDENTIAL
Date of the Document: 2014_11_25			
Complete Sec	ctions be	low as applica	ble:
CROSS REFERENCE the Above Information	to the Foll	owing Record:	
Record Series: AIR PA			
Primary Identification Number (Account / RN):	RN	100788959	
	Permit		APD Project 209744
Secondary Identification Number (Permit):	remmt		APD Project 209744
Comments:			
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Comments:			
The Following MEDIA Were Removed F	rom the f	 टिव्वादीह	
☐ Maps ☐ Photos ☐ CD		Oversize	Documents
Document Name / Number:			
Date of the Document:			
Location of the Media:	·		
Maps, Photos, and Oversize Documents ((information	that cannot be folde	ed to fit into an 8.5x11 folder)
are filed into their own folders within the C	-		,
Compact Disks are not accepted by the Ce	entral File Ro	om.	
Modeling files are not accepted by the Ce	ntral File Ro	om.	
A copy of this cross reference sheet shoul	d be attache	ed to all documents r	emoved from a record.
See the Permit Processing Team Leader with question	ıs.		

Additional Comments:

RECEIVED
FEB 0 2 2015
CENTRALFILEROOM

11/19/2014 -----NSR IMS - PROJECT RECORD ------

PROJECT#: 209744

PERMIT#: 7711A

STATUS: PENDING

DISP CODE:

RECEIVED: 04/23/2014 PROJTYPE: RENEWAL

AUTHTYPE: CONSTRUCT

ISSUED DT:

RENEWAL: 10/21/2014 11/25/2024

PROJECT ADMIN NAME: ASPHALT ROOFING PRODUCTION FACILITY PROJECT TECH NAME: ASPHALT ROOFING MANUFACTURING FACILITY

Assigned Team: MECH/AG TEAM

STAFF ASSIGNED TO PROJECT:

SCARMARDO, JACQUE

- REVIEWR1_2 -

AP INITIAL REVIEW

FUCHS, SARAH

- REVIEW ENG -

MECH/AG TEAM

CUSTOMER INFORMATION (OWNER/OPERATOR DATA)

ISSUED TO: BUILDING MATERIALS CORPORATION OF AMERICA

COMPANY NAME: Building Materials Corporation of America

CUSTOMER REFERENCE NUMBER: CN602717464

REGULATED ENTITY/SITE INFORMATION

REGULATED ENTITY NUMBER: RN100788959

ACCOUNT: DB0378S

PERMIT NAME: GAF MATERIALS

REGULATED ENTITY LOCATION: 2600 SINGLETON BLVD

REGION 04 - DFW METROPLEX **NEAR CITY: DALLAS** COUNTY: DALLAS

CONTACT DATA

CONTACT NAME: MR BRUCE

DAHLGREN

CONTACT ROLE: RESPONSIBLE OFFICIAL

JOB TITLE: PLANT MANAGER

ORGANIZATION: BUILDING MATERIALS CORPORATION OF

AMERICA

MAILING ADDRESS: 2600 SINGLETON BLVD, DALLAS, TX, 75212-3738

PHONE: (214) 637-8970 Ext: 0 FAX: (214) 637-5202 Ext: 0 EMAIL:BDAHLGREN@GAF.COM

CONTACT NAME: MR KEVIN BUSH

CONTACT ROLE: TECHNICAL CONTACT

JOB TITLE: ENVIRONMENTAL

ORGANIZATION: BUILDING MATERIALS CORPORATION OF

ENGINEER

AMERICA

MAILING ADDRESS: 2600 SINGLETON BLVD, DALLAS, TX, 75212-3738

PHONE: (214) 637-8933 Ext: 0 FAX: (214) 637-5202 Ext: 0 EMAIL:KBUSH@GAF.COM

PROJECT NOTES:			
	IFAT	NIAT	
	11-6.1	N() (F .

04/25/2014 SOS/DFC/NOT ON APWL

04/28/2014 SITE REVIEW GW 502887

05/01/2014 PUBLIC NOTICE GW 502887

08/08/2014 PROJECT TRANSFERRED FROM JOEL STANFORD TO SARAH FUCHS ON 8/8/2014.

PERMIT NOTES:

12/09/2009 INCORPORATE STANDARD PERMIT NO. 91414 AT NEXT AMEND. OR RENEWAL

FEE:

Reference Fee Receipt Number

Amount Fee Receipt Date

Fee Payment Type

1114329

R424868

6581.24

04/24/2014

CHECK

PUBLIC NOTICE:

Public Hearing Req Number

Public Meeting Req Number

Comment Count

Alternative Languages

0

0

0

SPANISH

TRACKING ELEMENTS:

TE Name	Start Date	Complete Date
APIRT RECEIVED PROJECT (DATE)	04/23/2014	
SITE REVIEW RFC SENT TO REGION (DATE)	04/28/2014	
APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (D	OATE) 05/01/2014	
CENTRAL REGISTRY UPDATED	05/01/2014	05/01/2014
COMPANY APPROVED DRAFT PUBLIC NOTICE (DATE)	05/01/2014	
LEGISLATORS NOTIFIED OF APPLICATION RECEIVED (DA	TE) 05/01/2014	
PROJECT DECLARED ADMIN COMPLETE (DATE)	05/01/2014	
PUBLIC NOTICE DRAFT SENT TO COMPANY (DATE)	05/01/2014	
PROJECT RECEIVED BY ENGINEER (DATE)	05/06/2014	
PUBLIC NOTICE COMMENT PERIOD (NSR 1ST NOTICE)	05/16/2014	05/30/2014
1ST NOTICE OCC COMPLETE (DATE)	06/23/2014	
COMPLIANCE HISTORY REVIEW COMPLETED (DATE)	09/02/2014	
DRAFT PERMIT RFC SENT TO REGION (DATE)	09/16/2014	
WORKING DRAFT PERMIT REVIEW CYCLE	09/16/2014	10/14/2014
FINAL PACKAGE TO TEAM LEADER OR SUPERVISOR FOR	REVIEW (DATE) 10/20/2014	
WORKING DRAFT PERMIT REVIEW CYCLE	11/03/2014	11/07/2014
POSTED TO EXECUTIVE DIRECTOR'S AGENDA (DATE)	11/13/2014	

Permit Unit

Type:

Industry Group Industry Type

FINAL PACKAGE TO SECTION MANAGER FOR REVIEW (DATE)

Source Type Control/BACT

Type

Start Date

11/19/2014

End Date MECHANICAL

ASPHALT ROOFING 01/26/2009

Company Building Materials Corporation of Permit Number 7711A

America

CityDallasProject Number209744CountyDallasAccount NumberDB-0378-SProject TypeRenewalRegulated Entity NumberRN100788959

Project Reviewer Sarah Fuchs Customer Reference Number CN602717464

Site Name Asphalt Roofing Manufacturing Facility

Project Overview

Building Materials Corporation of America requested a renewal of their permit which authorizes an asphalt roofing facility. With this renewal, the company requests that the Line 3 Stabilizer Thermal Fluid heater (Emission Point No. [EPN] HTR6) emission rates be updated to reflect the actual heat input rate of 3.97 Million British Thermal Units per hour (MMBtu/hr) instead of 6 MMBtu/hr. Additionally the company submitted emission rates in a previous application that were rounded to only one significant figure. Since the permitted emissions on the Maximum Allowable Emission Rates Table (MAERT) are rounded to two significant figures, discrepancies arose between the MAERT and the calculated emission rates. The company is therefore requesting that the affected values be corrected. Also, Special Condition 10 which refers to the transfer of filler and backing material has been removed. This Special Condition was based on misconceptions about facility operations and sources of emissions. Filler is received and transferred as part of an enclosed, pneumatic system. There are no expected emissions from filler receiving and transfer aside from emissions associated with the baghouses which control the system (authorized under Standard Permit Number 91414 and incorporated by reference). Additionally, Fiberglass backing material rolls are not an expected source emissions. Finally, the company has requested the removal of Special Condition 22 regarding stack sampling to determine opacity. The use of new boilerplate language for opacity and demonstration of continuous compliance has made this condition redundant.

Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)	
PM	104.47	104.36	-0.11	
PM ₁₀	104.47	104.36	-0.11	
PM _{2.5}	104.47	104.36	-0.11	
VOC	47.91	47.90	-0.01	
NO _X	20.01	19.13	-0.88	
CO	67.74	66.97	-0.77	
SO ₂	128.70	128.69	-0.01	
HAPs	<25.00	<25.00	0.00	

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	09/02/2014
Compliance period:	04/23/2009- 04/23/2014
Site rating & classification:	Satisfactory, 0.60
Company rating & classification:	Satisfactory, 0.63
Has the permit changed on the basis of the compliance	
history or rating?	No

Public Notice Information - 30 TAC Chapter 39 Rules

Rule Citation	Requirement	
39.403	Date Application Received:	04/23/2014
	Date Administratively	
	Complete:	05/01/2014

Permit No. 7711A Page 2 Regulated Entity No. RN100788959

Rule Citation	Requirement	
	Small Business Source?	No
	Date Leg Letters mailed:	05/01/2014
39.603	Date Published:	05/15/2014
	Publication Name:	The Dallas Observer
	Pollutants:	PM, PM ₁₀ , PM _{2.5} , VOC, NO _X , SO ₂ , CO and HAPs
	Date Affidavits/Copies Received:	06/16/2014
	Is bilingual notice required?	Yes
	Language:	Spanish
	Date Published:	05/15/2014
	Publication Name:	El Extra
	Date Affidavits/Copies	
	Received:	06/16/2014
	Date Certification of Sign	
	Posting / Application Availability Received:	06/23/2014
39.604	Public Comments Received?	No
	Hearing Requested?	No
	Meeting Request?	No
	Is 2nd Public Notice required?	No
39.419	If no, give reason:	Renewals with no increases, no new contaminants, and a satisfactory compliance history do not require 2nd Public Notice as per 30 TAC 39.419(e)(1).

Renewal Requirements - 30 TAC Chapter 116 Rules

Rule Citation	Requirement	
116.315(a)	Date of permit expiration:	10/21/2014
116.310	Date written notice of review was mailed:	01/08/2014
116.315(a)	Date application for Renewal (PI-1R) received:	04/23/2014
116.311(a)(2)	Is the facility being operated in accordance with all requirements and of the existing permit, including representations in the application for construct and subsequent amendments, and any previously granted re-	permit to enewal,
	unless otherwise authorized for a qualified facility?	Yes
116.311(a)(3)	Subject to NSPS? Subparts A, Dc, & UU	Yes
116.311(a)(4)	Subject to NESHAPS?	No, the site does not emit any air contaminants regulated under 40 CFR Part 61.
116.311(a)(5)	Subject to NESHAPS (MACT) for source categories?	Yes
0 (7.0)	Subparts A & AAAAAA	1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.
116.311(a)(6)	Does this project require case-by-case MACT?	No, the site is not a new major source of HAPs.
116.311(b)	Was there a condition of air pollution that had to be addressed during this project review?	No
116.314(a)	Does the facility meet all permit renewal requirements?	Yes
116.313	Permit Renewal Fee: \$ 6,581.60 Fee certification:	Yes
3 3	Applicable Outstanding Fees:	None as of 04/24/2014

Permit No. 7711A Page 3 Regulated Entity No. RN100788959

tle V Applicabi Rule Citation	lity - 30 TAC Chapter 122 Rules Requirement			
122.10(13)	Title V applicability: Yes, this facility operates under O-	2771.		
122.10(13)(A)	Is the site a major source under FCAA Section 112(b)?	No		
	Does the site emit 10 tons or more of any single HAP?	No		
	Does the site emit 25 tons or more of a combination?	No		
122.10(13)(C)	Does the site emit 100 tons or more of any air pollutant?	Yes		
122.10(13)(D)	Is the site a non-attainment major source?	No, the facility emits less than the 50 tpy NO _x emission major source threshold for DFW, and it emits less than the 50 tpy VOC emission		
		major source threshold.		
122.602	Periodic Monitoring (PM) applicability: The company is required to monitor temperature of the incinerator with an averaging period of one hour, and to monitor visible emissions once per week of blowing stills, of storage tanks, and of mineral handling and storage facilities.			
122.604	Compliance Assurance Monitoring (CAM) applicability: CAM applies to both the Thermal Oxidizer (direct-flame incinerator) (EPN 8/8A) and the Coalescing Filter Mist Elimination Systems (EPN CFL/34). CAM is achieved through following NESHAP (MACT) AAAAAAA requirements. Temperature monitoring for the Thermal Oxidizer as required by the MACT is required by Special Condition 28 at a 1 hour interval as opposed to the 3 hours interval specified in AAAAAAA. The Coalescing Filter Mist Elimination System is required to follow the operating range as specified in 40 Code of Federal Regulations (40 CFR) § 63.11562(a)(2) and (b)(3). The 3-hour average pressure drop across the device is required to fall within the approved operating range established as specified in 40 CFR § 63.11562(a)(2) and (b)(3).			

R	lec	ques	t 1	or	Comments
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Received From	Program/Area Name	Reviewed By/Date	Comments
Region:	4	N/A	Region did not respond by the comment deadline.
City:	Dallas	Brian Cunningham/ 09/25/2014	No objections

Process/Project Description

The plant manufactures asphalt shingles for the roofing industry. A dry, nonwoven fiberglass mat is fed into the roofing machine from an unwind stand. The fiberglass is carried through the coating section where coating asphalt mixed with a stabilizer (limestone) is applied to both surfaces of the mat. The coating operation is followed by the surfacing section. Ceramic colored granules are blended and dropped in proper sequence onto the coated web and embedded. The back surface of the sheet is sprinkled with sand to prevent it from adhering to rolls and itself in the finished package. The hot sheet, with a mineralized surface, then goes into the cooling section of the machine. Cooling is accomplished by passing the web over a series of water-cooled drums, through water mist sprays, and between air jets. It is then accumulated in the looper section of the machine to provide surge capacity required prior to cutting. Self-seal striping dots are then applied and the sheet is cut into shingles and automatically packaged. The boiler accepts the thermal oxidizer exhaust gas for preheating recovery and fires as necessary to meet the steam needs of the plant.

Pollution Prevention, Sources, and Controls - [30 TAC 116.311(b)(2)]

Emissions at the facility are produced by two heaters, the boiler and the standby boiler, all storage and process tanks, blowing stills, and all truck and railcar loading and unloading operations.

Permit No. 7711A Page 4 Regulated Entity No. RN100788959

The Standby Boiler (EPN BLR5) is rated at 19 Million British Thermal units/hour (MMBtu/hr) and is equipped with a low NO_x burner (with a manufacturer represented 30 parts per million rating).

Emissions from the blowing stills, loading racks, and storage tanks vent to a thermal oxidizer (direct-flame incinerator). The thermal incinerator has a rated destruction efficiency of 95% for PM/PM₁₀, H_2S , CO, and VOC.

Emissions from stabilizer storage, stabilizer heaters, the line 1 stabilizer use bin, and sand application are vented to baghouses. Emissions from the line 1 surfacing section are vented to dust collectors. These control units have a rated capture efficiency of at least 99%.

No abatement device or method was listed for capture and reduction of SO₂ from the listed facilities at the site. The controls are economically reasonable and technically practicable considering the age of the facility and the impact of its emissions on the surrounding area.

Emissions from planned startup and shutdown activities are authorized by this permit from an amendment approved in June 2013. Maintenance activities are authorized either under Permit by Rule or claimed under 30 Texas Administrative Code § 116.119, De Minimis Facilities or Sources. Startup and shutdown emissions are virtually indistinguishable from production emissions. Although there may be minor emissions associated with startup and shutdown, emission factors used to quantify production emissions are considered to have enough conservatism to include any incidental increases that may be attributed to startup and shutdown. In addition, emissions from planned startup and shutdown of combustion units should not result in any quantifiable hourly emissions change for products of combustion. Although there may be transitional and incidental spikes before units stabilize during startups (5 to 15 minutes), overall products of combustion are expected to be within hourly range limits for normal loads during production operations.

Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?

Company representative(s):

Contacted Via:

Date of contact:

Other permit(s) or permits by rule affected by this action:

No

Project Reviewer

11/10/204

Date

eam Leader/Section Manager/Backup

Bryan W. Shaw, Ph.D., P.E., Chairman Toby Baker, Commissioner Zak Covar, Commissioner Richard A. Hyde, P.E., Executive Director



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 25, 2014

MR BRUCE DAHLGREN
PLANT MANAGER
BUILDING MATERIALS CORPORATION OF AMERICA
2600 SINGLETON BLVD
DALLAS TX 75212-3738

Re: Permit Renewal

Permit Number: 7711A

Renewal Date: November 25, 2024

Building Materials Corporation of America Asphalt Roofing Manufacturing Facility

Dallas, Dallas County

Regulated Entity Number: RN100788959 Customer Reference Number: CN602717464

Account Number: DB-0378-S

Dear Mr. Dahlgren:

This is in response to your application Form PI-1R (General Application for Air Permit Renewals) concerning the proposed renewal of Permit Number 7711A. We understand that you request that the Line 3 Stabilizer Thermal Fluid Heater (Emission Point Number [EPN] HTR6) emission rates be updated to reflect the actual heat input rate of 3.97 MMBtu/hr. We also understand that you request to update emissions for several sources to correct rounding discrepancies. In addition we understand that you request the special condition referencing the transfer of filler and backing material be updated to better reflect operational practices. Also, this will acknowledge that your application for the above-referenced renewal is technically complete as of October 14, 2014.

In accordance with Title 30 Texas Administrative Code Section 116.314(a), and based on our review, Permit Number 7711A is hereby renewed. Enclosed are new general conditions (permit face), special conditions, and a maximum allowable emission rates table. We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met. This permit will be in effect for ten years from the date of approval (Commission's final decision). If this permit is appealed and the permittee does not commence any action authorized by this permit during judicial review, the term will not begin until judicial review is concluded.

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC Section 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

Mr. Bruce Dahlgren Page 2 November 25, 2014

Re: Permit Number: 7711A

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 7 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code Section 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the **effective date of the approval**. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

You are reminded that these facilities must be in compliance with all rules and regulations of the Texas Commission on Environmental Quality (TCEQ) and of the U.S. Environmental Protection Agency at all times.

If you need further information or have any questions, please contact Ms. Sarah Fuchs at (512) 239-1346 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Michael Wilson, P.E., Director

Muhael Sho

Air Permits Division

Office of Air

Texas Commission on Environmental Quality

MPW/sf

Enclosures

cc: Latha Kambham, Ph.D., Ms., Trinity Consultants, Dallas Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health Services, Dallas Air Section Manager, Region 4 - Fort Worth

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY AIR QUALITY PERMIT



A Permit Is Hereby Issued To
Building Materials Corporation of America
Authorizing the Continued Operation of an
Asphalt Roofing Manufacturing Facility
Located at Dallas, Dallas County, Texas
Latitude 32° 46′ 38″ Longitude -96° 51′ 48″



Permit: 7711A		
Issuance Date :	November 25, 2014	- Kal A. Bala
Renewal Date:	November 25, 2024	VA P
· · · · · · · · · · · · · · · · · · ·		For the Commission

- 1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code 116.116 (30 TAC 116.116)]
- 2. Voiding of Permit. A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1)the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC 116.120(a), (b) and (c)]
- 3. **Construction Progress**. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC 116.115(b)(2)(A)]
- 4. **Start-up Notification**. The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC 116.115(b)(2)(B)(iii)]
- 5. **Sampling Requirements**. If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC 116.115(b)(2)(C)]

Revised (10/12)

- 6. Equivalency of Methods. The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC 116.115(b)(2)(D)]
- 7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC 116.115(b)(2)(E)]
- 8. Maximum Allowable Emission Rates. The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC 116.115(b)(2)(F)]
- 9. **Maintenance of Emission Control**. The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with 30 TAC 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC 116.115(b)(2)(G)]
- 10. Compliance with Rules. Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC 116.115(b)(2)(H)]
- 11. This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC 116.110(e)]
- 12. There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC 116.115(c)]
- 13. Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in Texas Health and Safety Code (THSC) 382.003(3) or violate THSC 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
- 14. The permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.

Special Conditions

Permit Number 7711A

Emission Limitations

1. This permit authorizes those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission rates and other conditions specified in the table. In addition, this permit authorizes all emissions from planned startup and shutdown activities associated with facilities or groups of facilities that are authorized by this permit.

Fuel Specifications

- 2. Fuel for the facilities shall be pipeline-quality natural gas. Use of any other fuel will require prior approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).
- 3. Upon request by the Executive Director of the TCEQ, the TCEQ Regional Director, or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel utilized in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis.

Federal Applicability

- 4. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources in Title 40 Code of Federal Regulations (40 CFR) Part 60, specifically the following:
 - A. Subpart A General Provisions;
 - B. Subpart Dc Small Industrial-Commercial- Institutional Steam Generating Units; and
 - C. Subpart UU Asphalt Processing and Asphalt Roof Manufacture.
- 5. These facilities shall comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63, specifically the following:
 - A. Subpart A General Provisions; and
 - B. Subpart AAAAAA Area Sources: Asphalt Processing and Asphalt Roof Manufacturing.

Opacity/Visible Emission Limitations

6. Opacity of particulate matter emissions from the Coalescing Filter Mist Systems (Emission Point No. [EPN] CFL/34), the Electrostatic Precipitator (EPN CFL/34) (when used as a back-up control device for the filter mist systems), dust collector stacks, baghouse stacks,

- process heater vents, and building vents shall not exceed 5 percent, averaged over a six-minute period.
- Opacity of particulate matter emissions from any asphalt storage tank exhaust gases discharged into the atmosphere shall not exceed o percent, averaged over a six-minute period, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. Opacity of particulate matter emissions from any blowing still shall not exceed o percent, averaged over a six-minute period.
- 8. Opacity of emissions from any storage silo and mineral handling facility shall not exceed 1 percent, averaged over a six minute period.
- No visible fugitive emissions from the asphalt processing and asphalt roofing manufacturing operations and facilities, roads, or travel areas shall leave the property.

Operational Limitations, Work Practices, and Plant Design

- 10. The emissions from Stillyard Asphalt Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120; from Blowing Stills T-13 and T-26; from truck and railcar loading and unloading operations; and from the self-seal asphalt storage tank shall be vented to the thermal oxidizer (direct-flame incinerator).
- 11. Fabric filter baghouses, properly installed and in good working order, shall control particulate matter emissions from the Stabilizer Storages, Stabilizer Heaters, the Line 1 Stabilizer and Heater, the Line 1 Stabilizer Use Bin, and Sand Application when this equipment is in operation.
- 12. Dust collectors, properly installed and in good working order, shall control particulate matter emissions from the Line 1 Surfacing Section when this equipment is in operation.
- 13. The thermal oxidizer (direct-flame incinerator) shall be operated at an average incineration temperature of 1450°F measured immediately downstream of the incinerator, based on a one-hour averaging period, during normal operations. Normal operations are herein defined as any time period when asphalt blowing is occurring, and emissions from the blowing are vented to the direct-flame incinerator. The direct-flame incinerator shall be operated at a minimum incineration temperature of 1300°F during Standby Operating Conditions to assure compliance with the maximum allowable emission rates table (MAERT) limits for volatile organic compounds (VOC) from EPN 8/8A. Standby operating conditions are herein defined as when no process blowers are in operation on any blowing still venting to the direct-flame incinerator.

The permit holder is allowed to conduct stack sampling of the thermal oxidizer (direct-flame incinerator) during normal operations at an average temperature lower than 1450°F to demonstrate compliance with the MAERT limits for VOC from EPN 8/8A. Upon demonstration of compliance with the MAERT limits for VOC, the permit holder shall submit a permit action to modify the temperature requirement of the thermal oxidizer (direct-flame incinerator) during Normal Operations.

- 14. The maximum allowable asphalt throughput rates are 32,063 pounds per hour for Line 1 and 53,438 pounds per hour for Line 3.
- 15. The maximum allowable production rates for both Line 1 and Line 3, combined, are 171 tons per hour and 1,498,000 tons per year of finished shingles.
- 16. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.
- 17. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations. Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible PM emissions to maintain compliance with all TCEQ rules and regulations.
- 18. All stacks associated with the Line 1 Cooling Section (EPN COOL1) shall be no less than 64 feet measured from ground level. All stacks associated with the Line 3 Cooling Section (EPN COOL3) shall be no less than 73 feet measured from ground level.
- 19. There shall be no changes in representations unless the permit is altered or amended.
- 20. The following facilities are authorized by separate Standard Permit:

Table 1: Standard Permit References

EPN/ Source Name	Registration No.
NST-1/Baghouse 1 (Filler Transfer Operations)- L3	91414
NST-1/Baghouse 2 (Filler Transfer Operations)- L3	91414

Demonstration of Continuous Compliance

- 21. Upon request by the TCEQ Executive Director or the TCEQ Regional Director having jurisdiction, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere to demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions and/or otherwise prove satisfactory equipment performance. Sampling must be conducted in accordance with the TCEQ Sampling Procedures Manual and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director or the appropriate TCEQ Regional Director prior to conducting sampling.
- 22. All stack sampling shall be conducted within 60 days of being informed that testing is required, and it shall meet all requirements specified in the Sampling Requirements section of this permit's special conditions.

- 23. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the opacity limitations specified in this permit for Coalescing Filter Mist Systems Stack (EPN CFL/34), the Electrostatic Precipitator Stack (EPN CFL/34) (when used as a back-up control device for the filter mist systems), dust collector stacks, baghouse stacks, process heater vents, and building vents. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), and 5) at least two stack heights, but not more than five stack heights, from the emission point. If visible emissions are observed from the emission point, the owner or operator shall:
 - A. Take immediate action to eliminate visible emissions, record the corrective action within 24 hours, and comply with any applicable requirements in 30 Texas Administrative Code (TAC) § 101.201, Emissions Event Reporting and Record Keeping Requirements; or
 - B. Determine opacity using 40 CFR Part 60, Appendix A, Test Method 9. If the opacity limit is exceeded, take immediate action (as appropriate) to reduce opacity to within the permitted limit, record the corrective action within 24 hours, and comply with applicable requirements in 30 TAC § 101.201, Emissions Event Reporting and Record Keeping Requirements.
- 24. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the visible emissions limitation specified in this permit. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), 5) at least 15 feet, but not more than 0.25 mile, from the plume, and 6) in accordance with EPA 40 CFR Part 60, Appendix A, Test Method 22, except where stated otherwise in this condition. If visible emissions exceed 30 cumulative seconds in any six-minute period, the owner or operator shall take immediate action (as appropriate) to eliminate the excessive visible emissions. The corrective action shall be documented within 24 business hours of completion.
- For any asphalt storage tank, storage silo, or mineral handling facility, visible emissions 25. observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the corresponding opacity limit, the permit holder shall report a deviation.

Special Conditions Permit Number 7711A Page 5

For any blowing still, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation.

Compliance Assurance Monitoring

- 27. The temperature in the combustion chamber or immediately downstream of the combustion chamber of the thermal oxidizer (direct-flame incinerator) shall be measured and recorded four times per hour with an averaging period of one hour. The permit holder shall establish a minimum combustion temperature using the most recent performance test, manufacturer's recommendations, engineering calculations, and/or historical data. The monitoring instrumentation shall be maintained, calibrated, and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation.
- 28. The 3-hour average inlet gas temperature for the Coalescing Filter Mist Elimination Systems (Line 1 and Line 3 Asphalt Coaters) with ESP as Backup (EPN CFL/34) shall be maintained within the operating range established as specified in 40 CFR § 63.11562(a)(2) and (b)(3). The 3-hour average pressure drop across the device shall be maintained within the approved operating range established as specified in 40 CFR § 63.11562(a)(2) and (b)(3).

Sampling Requirements

29. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their own expense. Sampling ports and platforms shall be incorporated into the design of the stack(s) according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Office with jurisdiction.

- 30. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for continuing compliance demonstrations. If the plant is unable to operate at the maximum rates during compliance testing, then the production/throughput rates or other parameters may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates.
- 31. A pretest meeting shall be held with personnel from the TCEQ before the required tests are performed. The TCEQ Regional Office with jurisdiction shall be notified not less than 45 days prior to sampling to schedule a pretest meeting. The notice shall include:
 - A. Date for pretest meeting;
 - B. Date sampling will occur;
 - C. Points or sources to be sampled;
 - D. Name of firm conducting sampling;
 - E. Type of sampling equipment to be used; and
 - F. Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

- 32. Air contaminants to be tested for may include (but are not limited to) PM, CO, SO₂, NO_x, and VOC.
- 33. Alternate sampling methods and representative unit testing may be proposed by the permit holder. A written proposed description of any deviation from sampling procedures or emission sources specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. Such a proposal must be approved by the TCEQ Regional Office with jurisdiction at least two weeks prior to sampling.
- 34. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Air, Air Permits Division in Austin.
- 35. The sampling report shall include the following:
 - A. Plant production and throughput rates during tests; and
 - B. Thermal oxidizer (direct-flame incinerator) operating temperature during tests.
- 36. Copies of the final sampling report shall be forwarded to the TCEQ within 30 days after sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

Special Conditions Permit Number 7711A Page 7

One copy to the TCEQ Regional Office with jurisdiction.

One copy to the TCEQ Office of Air, Air Permits Division in Austin.

One copy to each appropriate local air pollution control program with jurisdiction.

Recordkeeping Requirements

- 37. Records shall be maintained at this facility site and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction to demonstrate compliance with permit limitations. These records shall be totaled for each calendar month, retained for a rolling 60-month period, and include the following:
 - A. Records of the exhaust gas temperature immediately downstream of the thermal oxidizer (direct-flame incinerator) to demonstrate compliance with 30 TAC § 115.126(1)(A)(i);
 - B. Records of either VOC concentration or mass emission rate of each vent gas stream for the Line 1 and Line 3 Cooling Sections at maximum actual operating conditions to demonstrate compliance with 30 TAC § 115.126(4);
 - C. Hourly asphalt throughput rates for Line 1 and for Line 3;
 - D. Combined Line 1 and Line 3 hourly and annual production rates of finished shingles;
 - E. Records of asphalt stored and used, that have the potential to emit Hazardous Air Pollutants (HAPs), kept in sufficient detail in order to allow all required emission rates to be fully and accurately calculated. Using this recorded data, a report shall be produced for the emission of HAPs (in tons per year) over the previous 12 consecutive months;
 - F. All malfunctions, repairs, and maintenance of abatement systems, which includes bag replacement and the manufacturer's suggested cleaning and maintenance schedule;
 - G. Quarterly observations for visible emissions and/or opacity determinations;
 - H. Records of road cleaning, application of road dust control, or road maintenance for dust control; and
 - I. All monitoring data and support information as specified in 30 TAC § 122.144.

Dated: November 25, 2014

Permit Number 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No.	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
Stillyard Operation				
HTR3 T-1 Laminating	T-1 Laminating Adhesive Bulk	NOx	0.05	0.22
	Storage Tank Heater Vent	SO ₂	0.01	0.01
		PM	0.01	0.02
		PM ₁₀	0.01	0.02
		PM _{2.5}	0.01	0.02
		СО	0.04	0.18
		VOC	0.01	0.01
Adhesive Bul	T-2 Laminating Adhesive Bulk	NOx	0.05	0.22
	Storage Tank heater	SO ₂	0.01	0.01
		PM	0.01	0.02
		PM ₁₀	0.01	0.02
		PM _{2.5}	0.01	0.02
		СО	0.04	0.18
		VOC	0.01	0.01
Asphalt Heater fo T-14 and T-15 Coating Asphalt Storage and Coati Feed Loop Vent	Asphalt Heater for T-14 and T-15	NO _x	0.10	0.44
	Coating Asphalt	SO ₂	0.01	0.01
	Feed Loop Vent	PM	0.01	0.03
		PM ₁₀	0.01	0.03
		PM _{2.5}	0.01	0.03

Emission Point No.	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
HTR5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage and Coating Feed Loop Vent	СО	0.08	0.35
		VOC	0.01	0.02
BLR5	Standby Boiler Vent	NO _x	0.82	3.59
		SO ₂	0.01	0.04
		PM	0.16	0.70
		PM ₁₀	0.16	0.70
		PM _{2.5}	0.16	0.70
		СО	1.73	7.58
		VOC	0.11	0.48
8/8A	Thermal Oxidizer (Direct Flame Incinerator) Exhaust through Waste Heat Boiler Stack	NOx	1.90	8.31
		SO ₂	29.35	128.55
		PM	2.62	11.46
		PM ₁₀	2.62	11.46
		PM _{2.5}	2.62	11.46
		со	11.34	49.65
		voc	0.09	0.37
WHBLR1	Waste Heat Recovery Boiler Natural Gas Burner Side Vent	NO _x	0.47	2.06
		SO ₂	0.01	0.04
		PM	0.11	0.48
		PM ₁₀	0.11	0.48
		PM _{2.5}	0.11	0.48
		СО	1.24	5.43
		VOC	0.08	0.35

Emission Point No.	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
Common to Line 1 a	and Line 3			
CFL/34	Coalescing Filter Mist Elimination	PM	0.63	2.76
	Systems (Line 1 and Line 3 Asphalt	PM ₁₀	0.63	2.76
	Coaters) with ESP as Backup (Stack)	PM _{2.5}	0.63	2.76
		VOC	5.76	25.23
Line 1 Operation				
1-1	Line 1 Stabilizer Storage and Heater	PM	0.23	1.01
	Baghouse Stack	PM ₁₀	0.23	1.01
		PM _{2.5}	0.23	1.01
1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM	0.03	0.13
	g	PM ₁₀	0.03	0.13
		PM _{2.5}	0.03	0.13
Line 1 Surfacing Section Dust Collector No. 1 Sta		PM	0.59	2.58
	Collector No. 1 Stack	PM ₁₀	0.59	2.58
		PM _{2.5}	0.59	2.58
Section D	Line 1 Surfacing Section Dust	PM	0.59	2.58
	Collector No. 2 Stack	PM ₁₀	0.59	2.58
		PM _{2.5}	0.59	2.58
	Line 1 Surfacing Section Dust	PM	0.59	2.58
	Collector No. 3 Stack	PM ₁₀	0.59	2.58
		PM _{2.5}	0.59	2.58
	Line 1 Cooling Section (3 stacks)	PM	8.52	37.30
	,	PM ₁₀	8.52	37.30

Emission Point No.	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
COOL1	Line 1 Cooling	PM _{2.5}	8.52	37.30
	Section (3 stacks)	voc	1.65	7.23
Line 3 Operation				
25	Sand Application Baghouse Stack	PM	1.50	6.57
	Dagnouse Stack	PM ₁₀	1.50	6.57
		PM _{2.5}	1.50	6.57
26A	Stabilizer Storage	PM	0.15	0.66
	Baghouse A Stack	PM ₁₀	0.15	0.66
		PM _{2.5}	0.15	0.66
26B	Stabilizer Storage Baghouse B Stack	PM	0.29	1.27
		PM ₁₀	0.29	1.27
		PM _{2.5}	0.29	1.27
1-/	Stabilizer Heater Baghouse Stack	PM	0.09	0.39
		PM ₁₀	0.09	0.39
		PM _{2.5}	0.09	0.39
28 Aspl	Asphalt Heater Vent	NOx	0.59	2.58
		SO ₂	<0.01	0.02
		PM	0.04	0.20
		PM ₁₀	0.04	0.20
		PM _{2.5}	0.04	0.20
		СО	0.49	2.15
		voc	0.03	0.14

Emission Point No.	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
FUG1	Plant-wide Fugitive Emissions	PM	0.91	3.97
		PM ₁₀	0.91	3.97
		PM _{2.5}	0.91	3.97
		VOC	0.43	1.88
COOL3	Line 3 Cooling Section (3 stacks)	PM	6.74	29.52
	Section (3 stacks)	PM ₁₀	6.74	29.52
		PM _{2.5}	6.74	29.52
		voc	2.76	12.09
The		NO _x	0.39	1.71
		SO ₂	0.01	0.01
		PM	0.03	0.13
		PM ₁₀	0.03	0.13
		PM _{2.5}	0.03	0.13
		со	0.33	1.45
		voc	0.02	0.09
All Source (site-wide)	Various	Single HAP		<10
		Aggregate HAP		<25

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

NO_x - total oxides of nitrogen SO₂ - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented

 PM_{10} - total particulate matter equal to or less than 10 microns in diameter, including $PM_{2.5}$, as represented

PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter

CO - carbon monoxide

Permit Number 7711A Page 6

Emission Sources - Maximum Allowable Emission Rates

HAP - hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C

(4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.

(5) Planned startup and shutdown emissions are included. Maintenance activities are not authorized by this permit.

Dated: November 25, 2014

Sarah Fuchs

From:

Latha Kambham <LKambham@trinityconsultants.com>

Sent:

Friday, November 07, 2014 3:38 PM

To:

Sarah Fuchs

Cc:

Bush, Kevin; Lele Bao

Subject:

RE: Building Materials Draft Special Conditions (Permit No. 7711A)

Hi Sarah,

We just heard back from GAF and there are no further changes. So, please put the permit in the signature chain.

Thank you so much for your help with revising these permit conditions.

Have a great weekend,

Latha

Latha Kambham, Ph.D.

Managing Consultant

Trinity Consultants

12770 Merit Dr, Ste 900 | Dallas, TX 75251

Office: 972-661-8100

Email: lkambham@trinityconsultants.com

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Trinity A Consultants

From: Sarah Fuchs [mailto:Sarah.Fuchs@tceq.texas.gov]

Sent: Friday, November 07, 2014 9:26 AM

To: Latha Kambham

Subject: RE: Building Materials Draft Special Conditions (Permit No. 7711A)

Hi Latha,

I was hoping to find out if you had heard back from GAF about the draft permit. I'm just waiting on their confirmation before I put the renewal project back in the signature chain.

Thank you,

Sarah Fuchs

TCEQ Air Permits Division Mechanical/Agricultural Team (512)239-1346



From: Latha Kambham [mailto:LKambham@trinityconsultants.com]

Sent: Tuesday, November 04, 2014 12:12 PM

To: Sarah Fuchs Cc: Lele Bao

Subject: RE: Building Materials Draft Special Conditions (Permit No. 7711A)

Thanks, Sarah!

Appreciate making this correction. We will send this to GAF and let you know as soon as receive a confirmation.

Thanks, Latha

.....

Latha Kambham, Ph.D.

Managing Consultant

Trinity Consultants

12770 Merit Dr, Ste 900 | Dallas, TX 75251

Office: 972-661-8100

Email: lkambham@trinityconsultants.com

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Trinity A Consultants

From: Sarah Fuchs [mailto:Sarah.Fuchs@tceq.texas.gov]

Sent: Tuesday, November 04, 2014 11:35 AM

To: Latha Kambham

Subject: RE: Building Materials Draft Special Conditions (Permit No. 7711A)

Hi Latha,

I removed Special Condition 22. This condition was left over from the current permit that was issued in 2010. I have attached the draft with the condition removed above.

Thank you,

Sarah Fuchs

TCEQ Air Permits Division Mechanical/Agricultural Team (512)239-1346



From: Latha Kambham [mailto:LKambham@trinityconsultants.com]

Sent: Monday, November 03, 2014 7:32 PM

To: Sarah Fuchs **Cc:** Lele Bao

Subject: RE: Building Materials Draft Special Conditions (Permit No. 7711A)

Hi Sarah,

Thanks for your time to discuss the filter transfer operations and updating the permit.

The conditions look good to us, but we will get a confirmation from the client as well and let you know ASAP.

Thanks, Latha

.....

Latha Kambham, Ph.D.

Managing Consultant

Trinity Consultants

12770 Merit Dr, Ste 900 | Dallas, TX 75251

Office: 972-661-8100

Email: <u>lkambham@trinityconsultants.com</u>

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Trinity<u>A</u> Consultants

From: Sarah Fuchs [mailto:Sarah.Fuchs@tceq.texas.gov]

Sent: Monday, November 03, 2014 3:36 PM

To: Latha Kambham

Subject: Building Materials Draft Special Conditions (Permit No. 7711A)

Hi Latha,

I have attached the draft Special Conditions. Special Condition 10 regarding the transfer of filler and backing material has been removed. Standard Permit 91414 has been referenced in the Conditions, as well. Please let me know if this document is acceptable within the next 15 days.

Thank you,

Sarah Fuchs

TCEQ

Air Permits Division



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Sarah Fuchs

From:

Sarah Fuchs

Sent:

Tuesday, November 04, 2014 11:35 AM

To:

'Latha Kambham'

Subject:

RE: Building Materials Draft Special Conditions (Permit No. 7711A)

Attachments:

Draft Conditions.docx

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Thank you,

Sarah Fuchs

TCEQ Air Permits Division Mechanical/Agricultural Team (512)239-1346



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Sent: Monday, November 03, 2014 7:32 PM

To: Sarah Fuchs **Cc:** Lele Bao

Subject: RE: Building Materials Draft Special Conditions (Permit No. 7711A)

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Thanks,

Latha

Latha Kambham, Ph.D.

Managing Consultant

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Email: lkambham@trinityconsultants.com

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From: Sarah Fuchs [mailto:Sarah.Fuchs@tceq.texas.gov]

Sent: Monday, November 03, 2014 3:36 PM

To: Latha Kambham

Subject: Building Materials Draft Special Conditions (Permit No. 7711A)

Hi Latha,

I have attached the draft Special Conditions. Special Condition 10 regarding the transfer of filler and backing material has been removed. Standard Permit 91414 has been referenced in the Conditions, as well. Please let me know if this document is acceptable within the next 15 days.

Thank you,

Sarah Fuchs
TCEQ
Air Permits Division
Mechanical/Agricultural Team
(512)239-1346



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- 16. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.
- 17. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations. Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible PM emissions to maintain compliance with all TCEQ rules and regulations.
- 18. All stacks associated with the Line 1 Cooling Section (EPN COOL1) shall be no less than 64 feet measured from ground level. All stacks associated with the Line 3 Cooling Section (EPN COOL3) shall be no less than 73 feet measured from ground level.
- 19. There shall be no changes in representations unless the permit is altered or amended.
- 20. The following facilities are authorized by separate Standard Permit:

Table 1: Standard Permit References

EPN/ Source Name	Registration No.
NST-1/Baghouse 1 (Filler Transfer Operations)- L3	91414
NST-1/Baghouse 2 (Filler Transfer Operations)- L3	91414

Demonstration of Continuous Compliance

- 21. Upon request by the TCEQ Executive Director or the TCEQ Regional Director having jurisdiction, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere to demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions and/or otherwise prove satisfactory equipment performance. Sampling must be conducted in accordance with the TCEQ Sampling Procedures Manual and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director or the appropriate TCEQ Regional Director prior to conducting sampling.
- 22. All stack sampling shall be conducted within 60 days of being informed that testing is required, and it shall meet all requirements specified in the Sampling Requirements section of this permit's special conditions.
- 23. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the opacity limitations specified in this permit for Coalescing Filter Mist Systems Stack (EPN CFL/34), the Electrostatic Precipitator Stack (EPN CFL/34) (when used as a back-up control device for the filter mist systems), dust collector stacks, baghouse stacks, process heater vents, and building vents. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), and 5) at least two stack heights, but

Special Conditions

Permit Number 7711A

Emission Limitations

1. This permit authorizes those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission rates and other conditions specified in the table. In addition, this permit authorizes all emissions from planned startup and shutdown activities associated with facilities or groups of facilities that are authorized by this permit.

Fuel Specifications

- 2. Fuel for the facilities shall be pipeline-quality natural gas. Use of any other fuel will require prior approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).
- 3. Upon request by the Executive Director of the TCEQ, the TCEQ Regional Director, or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel utilized in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis.

Federal Applicability

- 4. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources in Title 40 Code of Federal Regulations (40 CFR) Part 60, specifically the following:
 - A. Subpart A General Provisions;
 - B. Subpart Dc Small Industrial-Commercial- Institutional Steam Generating Units;
 - C. Subpart UU Asphalt Processing and Asphalt Roof Manufacture.
- 5. These facilities shall comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63, specifically the following:
 - A. Subpart A General Provisions; and
 - B. Subpart AAAAAA Area Sources: Asphalt Processing and Asphalt Roof Manufacturing.

Opacity/Visible Emission Limitations

6. Opacity of particulate matter emissions from the Coalescing Filter Mist Systems (Emission Point No. [EPN] CFL/34), the Electrostatic Precipitator (EPN CFL/34) (when used as a back-up control device for the filter mist systems), dust collector stacks, baghouse stacks, process heater vents, and building vents shall not exceed 5 percent, averaged over a sixminute period.

- 7. Opacity of particulate matter emissions from any asphalt storage tank exhaust gases discharged into the atmosphere shall not exceed o percent, averaged over a six-minute period, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. Opacity of particulate matter emissions from any blowing still shall not exceed o percent, averaged over a six-minute period.
- 8. Opacity of emissions from any storage silo and mineral handling facility shall not exceed 1 percent, averaged over a six minute period.
- 9. No visible fugitive emissions from the asphalt processing and asphalt roofing manufacturing operations and facilities, roads, or travel areas shall leave the property.

Operational Limitations, Work Practices, and Plant Design

- 10. The emissions from Stillyard Asphalt Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120; from Blowing Stills T-13 and T-26; from truck and railcar loading and unloading operations; and from the self-seal asphalt storage tank shall be vented to the thermal oxidizer (direct-flame incinerator).
- 11. Fabric filter baghouses, properly installed and in good working order, shall control particulate matter emissions from the Stabilizer Storages, Stabilizer Heaters, the Line 1 Stabilizer and Heater, the Line 1 Stabilizer Use Bin, and Sand Application when this equipment is in operation.
- 12. Dust collectors, properly installed and in good working order, shall control particulate matter emissions from the Line 1 Surfacing Section when this equipment is in operation.
- 13. The thermal oxidizer (direct-flame incinerator) shall be operated at an average incineration temperature of 1450°F measured immediately downstream of the incinerator, based on a one-hour averaging period, during normal operations. Normal operations are herein defined as any time period when asphalt blowing is occurring, and emissions from the blowing are vented to the direct-flame incinerator. The direct-flame incinerator shall be operated at a minimum incineration temperature of 1300°F during Standby Operating Conditions to assure compliance with the maximum allowable emission rates table (MAERT) limits for volatile organic compounds (VOC) from EPN 8/8A. Standby operating conditions are herein defined as when no process blowers are in operation on any blowing still venting to the direct-flame incinerator.

The permit holder is allowed to conduct stack sampling of the thermal oxidizer (direct-flame incinerator) during normal operations at an average temperature lower than 1450°F to demonstrate compliance with the MAERT limits for VOC from EPN 8/8A. Upon demonstration of compliance with the MAERT limits for VOC, the permit holder shall submit a permit action to modify the temperature requirement of the thermal oxidizer (direct-flame incinerator) during Normal Operations.

- 14. The maximum allowable asphalt throughput rates are 32,063 pounds per hour for Line 1 and 53,438 pounds per hour for Line 3.
- 15. The maximum allowable production rates for both Line 1 and Line 3, combined, are 171 tons per hour and 1,498,000 tons per year of finished shingles.

- 16. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.
- 17. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations. Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible PM emissions to maintain compliance with all TCEQ rules and regulations.
- 18. All stacks associated with the Line 1 Cooling Section (EPN COOL1) shall be no less than 64 feet measured from ground level. All stacks associated with the Line 3 Cooling Section (EPN COOL3) shall be no less than 73 feet measured from ground level.
- 19. There shall be no changes in representations unless the permit is altered or amended.
- 20. The following facilities are authorized by separate Standard Permit:

Table 1: Standard Permit References

EPN/ Source Name	Registration No.
NST-1/Baghouse 1 (Filler Transfer Operations)- L3	91414
NST-1/Baghouse 2 (Filler Transfer Operations)- L3	91414

Demonstration of Continuous Compliance

- 21. Upon request by the TCEQ Executive Director or the TCEQ Regional Director having jurisdiction, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere to demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions and/or otherwise prove satisfactory equipment performance. Sampling must be conducted in accordance with the TCEQ Sampling Procedures Manual and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director or the appropriate TCEQ Regional Director prior to conducting sampling.
- 22. The TCEQ Executive Director may require the permit holder to perform stack sampling or ambient air monitoring to determine the opacity, rate, composition, and/or concentration of the plant's emissions. The holder of this permit may request the TCEQ Executive Director to approve alternate sampling techniques or other means to determine the opacity, rates, composition, and/or concentration of emissions in accordance with 30 TAC §101.8.
- 23. All stack sampling shall be conducted within 60 days of being informed that testing is required, and it shall meet all requirements specified in the Sampling Requirements section of this permit's special conditions.
- 24. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the opacity limitations specified in this permit for

Coalescing Filter Mist Systems Stack (EPN CFL/34), the Electrostatic Precipitator Stack (EPN CFL/34) (when used as a back-up control device for the filter mist systems), dust collector stacks, baghouse stacks, process heater vents, and building vents. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), and 5) at least two stack heights, but not more than five stack heights, from the emission point. If visible emissions are observed from the emission point, the owner or operator shall:

- A. Take immediate action to eliminate visible emissions, record the corrective action within 24 hours, and comply with any applicable requirements in 30 Texas Administrative Code (TAC) § 101.201, Emissions Event Reporting and Record Keeping Requirements; or
- B. Determine opacity using 40 CFR Part 60, Appendix A, Test Method 9. If the opacity limit is exceeded, take immediate action (as appropriate) to reduce opacity to within the permitted limit, record the corrective action within 24 hours, and comply with applicable requirements in 30 TAC § 101.201, Emissions Event Reporting and Record Keeping Requirements.
- 25. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the visible emissions limitation specified in this permit. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), 5) at least 15 feet, but not more than 0.25 mile, from the plume, and 6) in accordance with EPA 40 CFR Part 60, Appendix A, Test Method 22, except where stated otherwise in this condition. If visible emissions exceed 30 cumulative seconds in any six-minute period, the owner or operator shall take immediate action (as appropriate) to eliminate the excessive visible emissions. The corrective action shall be documented within 24 business hours of completion.
- For any asphalt storage tank, storage silo, or mineral handling facility, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the corresponding opacity limit, the permit holder shall report a deviation.
- 27. For any blowing still, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than

0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation.

Compliance Assurance Monitoring

- 28. The temperature in the combustion chamber or immediately downstream of the combustion chamber of the thermal oxidizer (direct-flame incinerator) shall be measured and recorded four times per hour with an averaging period of one hour. The permit holder shall establish a minimum combustion temperature using the most recent performance test, manufacturer's recommendations, engineering calculations, and/or historical data. The monitoring instrumentation shall be maintained, calibrated, and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation.
- 29. The 3-hour average inlet gas temperature for the Coalescing Filter Mist Elimination Systems (Line 1 and Line 3 Asphalt Coaters) with ESP as Backup (EPN CFL/34) shall be maintained within the operating range established as specified in 40 CFR § 63.11562(a)(2) and (b)(3). The 3-hour average pressure drop across the device shall be maintained within the approved operating range established as specified in 40 CFR § 63.11562(a)(2) and (b)(3).

Sampling Requirements

- 30. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their own expense. Sampling ports and platforms shall be incorporated into the design of the stack(s) according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Office with jurisdiction.
- 31. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for continuing compliance demonstrations. If the plant

is unable to operate at the maximum rates during compliance testing, then the production/throughput rates or other parameters may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates.

- 32. A pretest meeting shall be held with personnel from the TCEQ before the required tests are performed. The TCEQ Regional Office with jurisdiction shall be notified not less than 45 days prior to sampling to schedule a pretest meeting. The notice shall include:
 - A. Date for pretest meeting;
 - B. Date sampling will occur;
 - C. Points or sources to be sampled;
 - D. Name of firm conducting sampling;
 - E. Type of sampling equipment to be used; and
 - F. Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

- 33. Air contaminants to be tested for may include (but are not limited to) PM, CO, SO₂, NO_x, and VOC.
- 34. Alternate sampling methods and representative unit testing may be proposed by the permit holder. A written proposed description of any deviation from sampling procedures or emission sources specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. Such a proposal must be approved by the TCEQ Regional Office with jurisdiction at least two weeks prior to sampling.
- 35. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Air, Air Permits Division in Austin.
- 36. The sampling report shall include the following:
 - A. Plant production and throughput rates during tests; and
 - B. Thermal oxidizer (direct-flame incinerator) operating temperature during tests.
- 37. Copies of the final sampling report shall be forwarded to the TCEQ within 30 days after sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Regional Office with jurisdiction.

One copy to the TCEQ Office of Air, Air Permits Division in Austin.

One copy to each appropriate local air pollution control program with jurisdiction.

Recordkeeping Requirements

- 38. Records shall be maintained at this facility site and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction to demonstrate compliance with permit limitations. These records shall be totaled for each calendar month, retained for a rolling 60-month period, and include the following:
 - A. Records of the exhaust gas temperature immediately downstream of the thermal oxidizer (direct-flame incinerator) to demonstrate compliance with 30 TAC § 115.126(1)(A)(i);
 - B. Records of either VOC concentration or mass emission rate of each vent gas stream for the Line 1 and Line 3 Cooling Sections at maximum actual operating conditions to demonstrate compliance with 30 TAC § 115.126(4);
 - C. Hourly asphalt throughput rates for Line 1 and for Line 3;
 - D. Combined Line 1 and Line 3 hourly and annual production rates of finished shingles;
 - E. Records of asphalt stored and used, that have the potential to emit Hazardous Air Pollutants (HAPs), kept in sufficient detail in order to allow all required emission rates to be fully and accurately calculated. Using this recorded data, a report shall be produced for the emission of HAPs (in tons per year) over the previous 12 consecutive months;
 - F. All malfunctions, repairs, and maintenance of abatement systems, which includes bag replacement and the manufacturer's suggested cleaning and maintenance schedule;
 - G. Quarterly observations for visible emissions and/or opacity determinations;
 - H. Records of road cleaning, application of road dust control, or road maintenance for dust control; and
 - I. All monitoring data and support information as specified in 30 TAC § 122.144.

Dated: <u>, 2014</u>

Sarah Fuchs

From:

Latha Kambham < LKambham@trinityconsultants.com>

Sent:

Tuesday, October 14, 2014 10:34 AM

To:

Sarah Fuchs

Cc:

Bush, Kevin; Farlough, Durwin; Lele Bao

Subject:

RE: Building Materials Corporation of America draft permit

Hi Sarah,

We do not have any additional comments or changes. We confirmed this with GAF as well.

Thank you so much for your help in revising the permit condition per our request. Please let us know if you need anything else for the next steps.

Latha

.....

Latha Kambham, Ph.D.

Managing Consultant

Trinity Consultants

12770 Merit Dr, Ste 900 | Dallas, TX 75251

Office: 972-661-8100

Email: lkambham@trinityconsultants.com

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Trinity A Consultants

From: Sarah Fuchs [mailto:Sarah.Fuchs@tceq.texas.gov]

Sent: Monday, October 13, 2014 4:34 PM

To: Latha Kambham

Subject: Building Materials Coporation of America draft permit

Hi Latha,

I just wanted to see how the draft review was going, and I wanted to remind you that comments are due tomorrow.

Thank you,

Sarah Fuchs

TCEQ Air Permits Division Mechanical/Agricultural Team (512)239-1346



The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

Request for Comments -- Draft Conditions TCEQ -- Air Permits Division Phone: (512)239-1250

Fax: (512)239-1300

Mailing Address: TCEQ, Air Permits, P.O. Box 13087, Austin, TX 78711-3087

Account No.: DB-0378-S

County: Dallas

TO: Region: 4

City: Dallas

Submitted by: Ms. Sara	Submitted by: Ms. Sarah Fuchs E-Mail ID: Sarah.Fuchs Phone: (512) 239-1346				
Date Request Submitted:	September 16, 20	014			
Comments Deadline: Oc	tober 7, 2014				
For deadlines less than	21 days Section M	anager approval is re	quired.		
Date Application Receive	ed by TCEQ in Aus	stin: April 23, 2014			
REGIONAL OFFICES submittal date. Permit di	: Please return con sposition will proce	nments ASAP, but no leed after comments are	ater than the comments dead received or after the comme	line which is 21 days from the nts deadline has passed.	
LOCAL PROGRAMS: regulations of the TCEQ. submittal date. Permit di Reviewer may request fas	The company belo Please return com sposition will procester response if need	w has submitted an apments ASAP, but no lated after comments are	plication for the project reference than the comments dead!	enced below in accordance with ine which is 21 days from the nts deadline has passed. Permit	
PROJECT TYPE: Renev	val		NEWLY AUTHORIZED	MSS?YESNO	
PROJECT NO.: 209744			REGULATED ENTITY N		
PERMIT NO.: 7711A					
COMPANY NAME: Bui	ilding Materials C	orporation Of	CUSTOMER REFERENCE	CE NO.: CN602717464	
PLANT NAME: Gaf Ma	iterials				
LOCATION: 2600 Single	eton Blvd				
UNIT NAME: Asphalt R	Roofing Production	n Facility	COUNTY: Dallas		
TECHNICAL CONTACT	: Kevin Bush		PHONE: (214) 637-8933		
OPERATING SCHEDUL	E: Continuo	us?			
	Hours/Day	Days/Week	Weeks/Year	Night Operation?	
Conditions to reflect cuite	ie company has req	uested a renewal of the	eir permit. The only changes	made are updating the Special at of 3.97 MMBtu/hr instead of adding to two significant figures.	
Attachments:		Draft Conditions	•		

Request for Comments -- Draft Permit RESPONSE

TO: Ms. Sarah Fuchs, Austin
FROM: Region: 4 City: Dallas County: Dallas Account No.: DB-0378-S
Copy of Application Received by your Office: YES NO Date Received: 4/23/14
COMPANY NAME: Building Materials Corporation Of America
PERMIT NO.: 7711A
REGULATED ENTITY NO: RN100788959 PROJECT NO.: 209744
Investigator's/Compliance Officer's Name (Please Print): Brian Cunningham Phone: 214 949-4203
Comments Deadline (from pg. 1): October 7, 2014 Date of Last Site Visit: 7/29/13
COMMENTS ON CONDITIONS: (Please mark up draft special conditions with your comments. Please address applicability and enforceability. List any additional conditions below):
Please note that the scope of the review is typically limited to the affected sources within the project, although suggestions to improve the enforceability of conditions not related to the specific permit action may be provided with justification. Please also note that changes in permit stringency during a renewal process must meet the criteria of Texas Health and Safety Code 382.055(e) and should be submitted with justification.
Compliance Determination Conditions:
Operational Limitations:
GENERAL COMMENTS: No Comments
PERMIT ISSUANCE:
If you have any objections to issuance, please note them here:

Special Conditions

Permit Number 7711A

Emission Limitations

1. This permit authorizes those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission rates and other conditions specified in the table. In addition, this permit authorizes all emissions from planned startup and shutdown activities associated with facilities or groups of facilities that are authorized by this permit.

Fuel Specifications

- 2. Fuel for the facilities shall be pipeline-quality natural gas. Use of any other fuel will require prior approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).
- 3. Upon request by the Executive Director of the TCEQ, the TCEQ Regional Director, or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel utilized in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis.

Federal Applicability

- 4. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources in Title 40 Code of Federal Regulations (40 CFR) Part 60, specifically the following:
 - A. Subpart A General Provisions;
 - B. Subpart Dc Small Industrial-Commercial- Institutional Steam Generating Units
 - C. Subpart UU Asphalt Processing and Asphalt Roof Manufacture.
- 5. These facilities shall comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63, specifically the following:
 - A. Subpart A General Provisions; and
 - B. Subpart AAAAAA Area Sources: Asphalt Processing and Asphalt Roof Manufacturing.

Opacity/Visible Emission Limitations

6. Opacity of particulate matter emissions from the Coalescing Filter Mist Systems (Emission Point No. [EPN] CFL/34), and the Electrostatic Precipitator (EPN CFL/34) (when used as a back-up control device for the filter mist systems), dust collector stacks, baghouse stacks,

- process heater vents, and building vents shall not exceed 5 percent, averaged over a six-minute period.
- 7. Opacity of particulate matter emissions from any asphalt storage tank exhaust gases discharged into the atmosphere shall not exceed o percent, averaged over a six-minute period, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. Opacity of particulate matter emissions from any blowing still shall not exceed o percent, averaged over a six-minute period.
- 8. Opacity of emissions from any storage silo and mineral handling facility shall not exceed 1 percent, averaged over a six minute period.
- 9. No visible fugitive emissions from the asphalt processing and asphalt roofing manufacturing operations and facilities, roads, or travel areas shall leave the property.

Operational Limitations, Work Practices, and Plant Design

- 10. All filler and backing material shall be received and transferred with no visible emissions.
- 11. The emissions from Stillyard Asphalt Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120; from Blowing Stills T-13 and T-26; from truck and railcar loading and unloading operations; and from the self-seal asphalt storage tank shall be vented to the thermal oxidizer (direct-flame incinerator).
- 12. Fabric filter baghouses, properly installed and in good working order, shall control particulate matter emissions from the Stabilizer Storages, Stabilizer Heaters, the Line 1 Stabilizer Use Bin, and Sand Application when this equipment is in operation.
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The permit holder is allowed to conduct stack sampling of the thermal oxidizer (direct-flame incinerator) during normal operations at an average temperature lower than 1450°F to demonstrate compliance with the MAERT limits for VOC from EPN 8/8A. Upon demonstration of compliance with the MAERT limits for VOC, the permit holder shall submit a permit action to modify the temperature requirement of the thermal oxidizer (direct-flame incinerator) during Normal Operations.

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- 20. There shall be no changes in representations unless the permit is altered or amended.

Demonstration of Continuous Compliance

- 21. Upon request by the TCEQ Executive Director or the TCEQ Regional Director having jurisdiction, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere to demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions and/or otherwise prove satisfactory equipment performance. Sampling must be conducted in accordance with the TCEQ Sampling Procedures Manual and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director or the appropriate TCEQ Regional Director prior to conducting sampling.
- 22. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the opacity limitations specified in this permit for Coalescing Filter Mist Systems Stack (EPN CFL/34), the Electrostatic Precipitator Stack (EPN CFL/34) (when used as a back-up control device for the filter mist systems), dust collector stacks, baghouse stacks, process heater vents, building vents, asphalt storage tank exhaust gases, any blowing still, and any storage silo and mineral handling facility. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), and 5) at least two stack heights, but not more than five stack heights, from the emission point. If visible emissions are observed from the emission point, the owner or operator shall:
 - A. Take immediate action to eliminate visible emissions, record the corrective action within 24 hours, and comply with any applicable requirements in 30 Texas

Special Conditions Permit Number 7711A Page 4

- Administrative Code (TAC) § 101.201, Emissions Event Reporting and Record Keeping Requirements; or
- B. Determine opacity using 40 CFR Part 60, Appendix A, Test Method 9. If the opacity limit is exceeded, take immediate action (as appropriate) to reduce opacity to within the permitted limit, record the corrective action within 24 hours, and comply with applicable requirements in 30 TAC § 101.201, Emissions Event Reporting and Record Keeping Requirements.
- 23. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the visible emissions limitation specified in this permit. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), 5) at least 15 feet, but not more than 0.25 mile, from the plume, and 6) in accordance with EPA 40 CFR Part 60, Appendix A, Test Method 22, except where stated otherwise in this condition. If visible emissions exceed 30 cumulative seconds in any six-minute period, the owner or operator shall take immediate action (as appropriate) to eliminate the excessive visible emissions. The corrective action shall be documented within 24 business hours of completion.
- For any asphalt storage tank and storage silo and mineral handling facility, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the corresponding opacity limit, the permit holder shall report a deviation.
- 25. For any blowing still, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible

emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation.

26. The temperature in the combustion chamber or immediately downstream of the combustion chamber of the thermal oxidizer (direct-flame incinerator) shall be measured and recorded four times per hour with an averaging period of one hour. The permit holder shall establish a minimum combustion temperature using the most recent performance test, manufacturer's recommendations, engineering calculations, and/or historical data. The monitoring instrumentation shall be maintained, calibrated, and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation.

Compliance Assurance Monitoring

27. The 3-hour average inlet gas temperature for the Coalescing Filter Mist Elimination Systems (Line 1 and Line 3 Asphalt Coaters) with ESP as Backup (EPN CFL/34) shall be maintained within the operating range established as specified in 40 Code of Federal Regulations (40 CFR) § 63.11562(a)(2) and (b)(3). The 3-hour average pressure drop across the device shall be maintained within the approved operating range established as specified in 40 CFR § 63.11562(a)(2) and (b)(3).

Sampling Requirements

- 28. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their own expense. Sampling ports and platforms shall be incorporated into the design of the stack(s) according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Office with jurisdiction.
- 29. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for continuing compliance demonstrations. If the plant is unable to operate at the maximum rates during compliance testing, then the production/throughput rates or other parameters may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates.

- 30. A pretest meeting shall be held with personnel from the TCEQ before the required tests are performed. The TCEQ Regional Office with jurisdiction shall be notified not less than 45 days prior to sampling to schedule a pretest meeting. The notice shall include:
 - A. Date for pretest meeting;
 - B. Date sampling will occur;
 - C. Points or sources to be sampled;
 - D. Name of firm conducting sampling;
 - E. Type of sampling equipment to be used; and
 - F. Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

- 31. Air contaminants to be tested for may include (but are not limited to) PM, CO, SO₂, NO_x, and VOC.
- 32. Alternate sampling methods and representative unit testing may be proposed by the permit holder. A written proposed description of any deviation from sampling procedures or emission sources specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. Such a proposal must be approved by the TCEQ Regional Office with jurisdiction at least two weeks prior to sampling.
- 33. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Air, Air Permits Division in Austin.
- 34. The sampling report shall include the following:
 - A. Plant production and throughput rates during tests; and
 - B. Thermal oxidizer (direct-flame incinerator) operating temperature during tests.
- 35. Copies of the final sampling report shall be forwarded to the TCEQ within 30 days after sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Regional Office with jurisdiction.

One copy to the TCEQ Office of Air, Air Permits Division in Austin.

One copy to each appropriate local air pollution control program with jurisdiction.

Recordkeeping Requirements

- 36. Records shall be maintained at this facility site and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction to demonstrate compliance with permit limitations. These records shall be totaled for each calendar month, retained for a rolling 60-month period, and include the following:
 - A. Records of the exhaust gas temperature immediately downstream of the thermal oxidizer (direct-flame incinerator) to demonstrate compliance with 30 TAC § 115.126(1)(A)(i);
 - B. Records of either VOC concentration or mass emission rate of each vent gas stream for the Line 1 and Line 3 Cooling Sections at maximum actual operating conditions to demonstrate compliance with 30 TAC § 115.126(4);
 - C. Hourly asphalt throughput rates for Line 1 and for Line 3;
 - D. Combined Line 1 and Line 3 hourly and annual production rates of finished shingles;
 - E. Records of asphalt stored and used, that have the potential to emit Hazardous Air Pollutants (HAPs), kept in sufficient detail in order to allow all required emission rates to be fully and accurately calculated. Using this recorded data, a report shall be produced for the emission of HAPs (in tons per year) over the previous 12 consecutive months;
 - F. All malfunctions, repairs, and maintenance of abatement systems, which includes bag replacement and the manufacturer's suggested cleaning and maintenance schedule;
 - G. Quarterly observations for visible emissions and/or opacity determinations;
 - H. Records of road cleaning, application of road dust control, or road maintenance for dust control; and
 - I. All monitoring data and support information as specified in 30 TAC § 122.144.

Dated:

Permit Number 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No.	Source Name (2)	Air Contaminant Name	Emission R	ates (5)
(1)	Source Name (2)	(3)	lbs/hour	TPY (4)
Stillyard Operation		*		
HTR3	T-1 Laminating Adhesive Bulk	NO _x	0.05	0.22
	Storage Tank Heater Vent	SO ₂	0.01	0.01
	Vent	PM	0.01	0.02
		PM ₁₀	0.01	0.02
		PM _{2.5}	0.01	0.02
	W 2	СО	0.04	0.18
	12 mm	voc	0.01	0.01
HTR4	T-2 Laminating Adhesive Bulk Storage Tank heater Vent	NO _x	0.05	0.22
		SO ₂	0.01	0.01
garanta da santa da s		PM	0.01	0.02
		PM ₁₀	0.01	0.02
		PM _{2.5}	0.01	0.02
		СО	0.04	0.18
۰		VOC	0.01	0.01
HTR5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage and Coating	NO _x	0.10	0.44
		SO ₂	0.01	0.01
	Feed Loop Vent	PM	0.01	0.03
		PM ₁₀	0.01	0.03
		PM _{2.5}	0.01	0.03

Emission Point No.	6 7 (6)	Air Contaminant Name	Emission Ra	ates (5)
(1)	Source Name (2)	(3)	lbs/hour	TPY (4)
HTR5	Asphalt Heater for	СО	0.08	0.35
	T-14 and T-15 Coating Asphalt Storage and Coating Feed Loop Vent	voc	0.01	0.02
BLR5	Standby Boiler Vent	NOx	0.82	3.59
		SO ₂	0.01	0.04
		PM	0.16	0.70
		PM ₁₀	0.16	0.70
		PM _{2.5}	0.16	0.70
		co	1.73	7.58
		voc	0.11	0.48
8/8A	Thermal Oxidizer (Direct Flame Incinerator) Exhaust through Waste Heat Boiler Stack	NOx	1.90	8.31
		SO ₂	29.35	128.55
		PM	2.62	11.46
		PM ₁₀	2.62	11.46
		PM _{2.5}	2.62	11.46
ing a second control of the second control o		со	11.34	49.65
		VOC	0.09	0.37
WHBLR1	Waste Heat Recovery Boiler	NO _x	0.47	2.06
	Natural Gas Burner Side Vent	SO ₂	0.01	0.04
	Side velit	PM	0.11	0.48
	T.	PM ₁₀	0.11	0.48
	1	PM _{2.5}	0.11	0.48
		СО	1.24	5.43
		VOC	0.08	0.35

Emission Point No.	Source Name (2)	Air Contaminant Name	Emission Rates (5)		
(1)	Source Name (2)	(3)	lbs/hour	TPY (4)	
Common to Line 1 a	nd Line 3				
CFL/34	Coalescing Filter Mist Elimination	PM	0.63	2.76	
	Systems (Line 1 and Line 3 Asphalt	PM ₁₀	0.63	2.76	
	Coaters) with ESP as Backup (Stack)	PM _{2.5}	0.63	2.76	
	-	voc	5.76	25.23	
Line 1 Operation				4	
1-1	Line 1 Stabilizer Storage and Heater	PM	0.23	1.01	
	Baghouse Stack	PM ₁₀	0.23	1.01	
		PM _{2.5}	0.23	1.01	
1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM	0.03	0.13	
		PM ₁₀	0.03	0.13	
		PM _{2.5}	0.03	0.13	
1-4	Line 1 Surfacing Section Dust Collector No. 1 Stack	PM	0.59	2.58	
		PM ₁₀	0.59	2.58	
		PM _{2.5}	0.59	2.58	
1-5	Line 1 Surfacing Section Dust Collector No. 2 Stack	PM	0.59	2.58	
		PM ₁₀	0.59	2.58	
		PM _{2.5}	0.59	2.58	
1-6	Line 1 Surfacing Section Dust	РМ	0.59	2.58	
	Collector No. 3 Stack	PM ₁₀	0.59	2.58	
		PM _{2.5}	0.59	2.58	
Cool 1	Line 1 Cooling Section (3 stacks)	PM	8.52	37.30	
	Socion (3 stucks)	PM ₁₀	8.52	37.30	

Emission Point No.	C	Air Contaminant Name	Emission Ra	tes (5)
(1)	Source Name (2)	(3)	lbs/hour	TPY (4)
Cool 1	Line 1 Cooling Section (3 stacks)	PM _{2.5}	8.52	37.30
	Section (3 stacks)	voc	1.65	7.23
Line 3 Operation				
25	Sand Application Baghouse Stack	PM	1.50	6.57
	Dagnouse otack	PM ₁₀	1.50	6.57
		PM _{2.5}	1.50	6.57
26A	Stabilizer Storage Baghouse A Stack	PM	0.15	0.66
	Bagnouse A Stack	PM ₁₀	0.15	0.66
		PM _{2.5}	0.15	0.66
26B	Stabilizer Storage Baghouse B Stack	PM	0.29	1.27
		PM ₁₀	0.29	1.27
		PM _{2.5}	0.29	1.27
27	Stabilizer Heater Baghouse Stack	PM	0.09	0.39
		PM ₁₀	0.09	0.39
		PM _{2.5}	0.09	0.39
28	Asphalt Heater Vent	NO _x	0.59	2.58
		SO ₂	<0.01	0.02
		PM	0.04	0.20
		PM ₁₀	0.04	0.20
		PM _{2.5}	0.04	0.20
	*	со	0.49	2.15
		VOC	0.03	0.14

Emission Point No.	Source Name (2)	Air Contaminant Name	Emission Rates (5)	
(1)	Source Name (2)	(3)	lbs/hour	TPY (4)
FUG1	Plant-wide Fugitive Emissions	PM	0.91	3.97
		PM ₁₀	0.91	3.97
		PM _{2.5}	0.91	3.97
		voc	0.43	1.88
COOL3	Line 3 Cooling Section (3 stacks)	PM	6.74	29.52
	Section (3 stacks)	PM ₁₀	6.74	29.52
		PM _{2.5}	6.74	29.52
		voc	2.76	12.09
HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO _x	0.39	1.71
		SO ₂	0.01	0.01
		PM	0.03	0.13
		PM ₁₀	0.03	0.13
		PM _{2.5}	0.03	0.13
		со	0.33	1.45
		voc	0.02	0.09
All Source (site-wide)	Various	Single HAP		<10
	·	Aggregate HAP		<25

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

NO_x - total oxides of nitrogen

SO₂ - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$, as represented

 PM_{10} - total particulate matter equal to or less than 10 microns in diameter, including $PM_{2.5}$, as represented

 $PM_{2.5}$ - particulate matter equal to or less than 2.5 microns in diameter

CO - carbon monoxide

(4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.(5) Planned startup and shutdown emissions are included. Maintenance activities are not authorized by this permit.

Dated:

Main Query Page

Program Area Search

Compliance History				***************************************	
RE Name:	GAF MATERIALS		RN:	RN100788959	
Classification:	SATISFACTORY	Rating:	0.60	Publication Date:	Nov 15, 2013
Customer Name	BUILDING MATERIALS CORPO	RATION OF AMERICA	CN:	CN600474753	
Classification:	SATISFACTORY	Rating:	0.63	Publication Date:	Nov 15, 2013
Repeat Violator Ind:	NO				

Compliance History Start: 04/24/2014 End: 04/24/2009

Submit

1-0 of 0 Enforcement Action Records

Enforc	Enforcement Actions					
Type	Effective Date	Citation/Requirement Provision	Abbv. Description	Violation Classification (Trk No)		

O convictions returned

Criminal Convictions					
Conviction Date		ımber of		Violations	
		Misdemeanors	Citation/Requirement Provision	Abbv. Description	Classification (Trk No)

O events returned

Chronic Excessive Emis	sions Events	*****	
Start Date	Status Code	Status Date	Track Number

1-7 of 7 Investigation Records

Investigations				
Investigation Start Date	Туре	Investigation Status Date		
Jun 23, 2009	Compliance Investigation	Jun 30, 2009		
Dec 8, 2009	Compliance Invest File Review	Dec 23, 2009		
Feb 9, 2010	Compliance Invest File Review	Mar 23, 2010		
Dec 21, 2010	Compliance Invest File Review	Dec 21, 2010		
Jun 23, 2011	Compliance Investigation	Aug 10, 2011		
Mar 12, 2013	Compliance Invest File Review	May 23, 2013		
Jul 29, 2013	Compliance Investigation	Aug 27, 2013		

1-4 of 4 Notice of Violation Records

Notic	e of Vio	lations	-		
NOV Date		Citation	Allegation	Classification (Trk No)	Self- Report
Jun 30, 2009		30 TAC Chapter 116, SubChapter B 116.116(a)(1) Not applicable to CH	Failure to have correct representations with regard to construction plans and operation procedures reflected in the NSR permit.		NO
Jun 30, 2009		40 CFR Chapter 60, SubChapter C, PT 60, SubPT Dc 60.48c(g) Not applicable to CH	Failure to record daily fuel consumption for the facility.	MODERATE (368956)	NO
Jun 30, 2009]	30 TAC Chapter 116, SubChapter B 116.110(a); 5C THSC Chapter 382 382.0518(a); 5C THSC Chapter 382 382.085(b) Not applicable to CH	Failure to obtain authorization before any modification of any existing facility which may emit air contaminants into the air.	MODERATE (368953)	NO
May 31, 2013		30 TAC Chapter 116, SubChapter B 116.115(c); 5C THSC Chapter 382 382.085(b) PERMIT Special Condition 26 Not applicable to CH	Failure to submit copies of the final sampling report to the TCEQ within 30 days, as require by Special Condition 26, of NSR Permit 7711A.	MINOR (495607)	NO

1-0 of 0 Environmental Audit Records

Environmental Audits				
Disclosure Of Violation				
Notice of Audit Date DOV	DOV Date		Violations	
	DOV Date	Classification	Citation/Requirement Provision	Abbv. Description

0 systems returned

Environmen	tal Manage	ment Systems	
Туре	Tier	Certification Date	Implementation Date

0 assessments returned

Voluntary On-Site	Compliance Assess	ments		
Start D	Start Date Status Code		Status Date	
0 programs returned				
Voluntary Pollution	n Reduction Progra	ms		
Name	Level	Start Date of Participation		
0 early compliance actions	returned			
Early Compliance				
Dat	e	Desc	ription	

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GAF MATERIALS CORPORATION

2600 Singleton Boulevard, Dallas, TX 75212

Tel: 214-637-1060

June 19, 2014

Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

Re: Public Notice Requirements - Public Notice Verification Form

NSR Permit Renewal Application Approval and Public Notice Authorization

NSR Permit Number: 7711A

Building Materials Corporation of America. - Dallas Plant - Dallas County

CN 602717464, RN 100788959

To Whom It May Concern:

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility in Dallas, Texas (Dallas Plant). The Plant operates under New Source Review (NSR) Permit No. 7711A issued on October 21, 2004.

GAF submitted a NSR Permit renewal application with Concurrent Permit Alteration for NSR Permit No. 7711A on April 22, 2014. This permit renewal application was declared administratively complete on May 1, 2014. As a part of the air permitting process, the Dallas Plant is required to publish a formal public notice in a newspaper of general circulation in the municipality nearest to the facility location. In accordance with the guidance package received from the TCEQ on May 1, 2014, the Dallas Plant has completed the following:

- Published a formal public notice on May 15, 2014 in the following newspapers circulated in Dallas, Dallas County:
 - The Dallas Observer (English)
 - o El Extra (Spanish)
- Placed a copy of the permit renewal application at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Texas, for public viewing and copying, beginning May 15, 2014
- Prepared and posted signs at the Dallas Plant on May 15, 2014
- > Submitted the original newspaper clippings showing publication date and newspaper name in English and Spanish on May 28, 2014
- Submitted the original Affidavits of Publication for Air Permitting to the TCEQ on June 12, 2014

The Dallas Plant is required to submit the Public Notice Verification Form to the TCEQ within 10 business days after end of the designated comment period. As such, GAF is submitting the Public Notice Verification Form with this letter.

Photocopies of these submittals are being mailed to the following, per the Instructions for Public Notice:

U.S. Environmental Protection Agency

Region 6

Attn: Air Permits Section (6PD-R) 1445 Ross Avenue, Suite 1200

Dallas, Texas 75202-2733

Texas Commission on Environmental Quality

Air Section Manager

Dallas/Fort Worth Regional Office

2309 Gravel Drive

Fort Worth, Texas 76118-6951

Texas Commission on Environmental Quality

Office of Air

Air Permits Division, MC-163

Ms. Ann Mosher

P.O. Box 13087

Austin, Texas 78711-3087

Section Manager

Air Pollution Control Program

City of Dallas Environmental and Health Services

320 East Jefferson Boulevard, Room LL 13

Dallas, Texas 75203-2632

If you have any questions, please feel free to contact Mr. Kevin Bush of GAF at (214) 637-8933 or Ms. Latha Kambham of Trinity Consultants at (972) 661-8100.

Bruce Dahlgren Plant Manager

cc:

Ms. Ann Mosher, TCEQ Air Permits Division

Ms. Elizabeth Smith, TCEQ Regional Office 4

Mr. David Miller, City of Dallas, Air Pollution Control Program

Mr. Kevin Bush, GAF

Mr. Durwin Farlough, GAF

Ms. Latha Kambham, Trinity Consultants



Applicant Name: Building Materials Co	rporation of Americ	ca		
Site or Facility Name: Dallas Plant		-		
TCEQ Account Number (if applicable):	DB-0378-S	Permit Number: 7711A		
Regulated Entity Number (RN): 100788	8959	Cus	tomer Number (CN): 6027174	464
All applicants must complete all appl to the attention of the Office of the Chie comment period . For more information notice package.	f Clerk within 10 l	busi	ness days <u>after the end</u> of	f the designated
Al	ternative Langua	ige (Checklist	
I have contacted the appropriate school	district.			⊠ Yes □ No
School District: Dallas Independent Sch	nool District		Phone Number: 972-925-67	83
Person Contacted: Ms. Sylvia Martinez			Date: 02/10/2014	
Is a bilingual education program (BEP) district?	required by the Tex	as E	ducation Code in the	⊠ Yes □ No
If answer is "NO," skip to first que (Note: A BEP is different from "English schools that only offer ESL will not trig	h as a Second Lang	иаде	" (ESL) program; and Eleme	entary/Middle
Notice in an alternative language is reque conditions is met:	uired if a BEP is re	quir	ed in the District, and one o	f the following
 students in the elementary or midd program at that school; 	le school nearest th	e fac	ility are enrolled in a	⊠ Yes □ No
2. students from the elementary or middle school nearest the facility attend a BEP at another location; or ☐ Yes ☒ No				☐ Yes ⊠ No
3. the school district that otherwise would be required to provide a BEP has been granted an exception from the requirements to provide the program, as provided for in 19 Texas Administrative Code 89.1207(a). □ Yes ☑ No				
If the answer is "NO" to 1, 2, and 3 abo	ove , then alternativ	e lar	iguage notice is not require	ed.
The name of the elementary school near	rest to the proposed	or e	xisting facility is:	
C.F. Carr Elementary School				
The name of the middle school nearest t	to the proposed or e	xisti	ng facility is:	
Thomas A Edison Middle Learning Cent	ter			
The following language(s) is/are utilized	d in the bilingual pr	ogra:	m:	
Spanish				
If notice in an alternative language language notice(s) and post altern <i>Public Notice</i> and certify complian	ative language si	gn(s	s), as outlined in the <i>Inst</i> i	ernative ructions for



Applicant Name: Building Materials Corporation of	America			
Site or Facility Name: Dallas Plant				
TCEQ Account Number (if applicable): DB-0378-S	it Number: 7711A	1		
Regulated Entity Number (RN): 100788959	Custo	omer Number (CN	N): 602717464	
For more information regarding public notice, refer	to the instruct	ions in the public	notice package.	
Alternative La	nguage Veri	fication		
 A BEP is required by the Texas Education Code permit application and is subject to alternative requirements. If "NO," skip 2 through 6 and complete si name of applicant. 	language publi	ic notice	⊠ Yes □ No	
2. The applicant has conducted a diligent search for a newspaper or publication of general circulation in both the municipality and county in which the facility is located (or proposed to be located).			⊠ Yes □ No	
3. A newspaper or publication could not be found in any of the alternative language(s) in which notice is required.			☐ Yes ⊠ No	
4. The publishers of the newspaper listed below refused to publish the notice as requested, and another newspaper or publication in the same language and of general circulation could not be found in the municipality or county in which the facility is located (or proposed to be located). ☐ Yes ☐ No ☒ N/A				
Newspaper:		Language:		
5. Proof of publication of the newspaper alternative language notice(s) and the requested affidavits have been sent to the TCEQ.		notice(s) and	⊠ Yes □ No	
6. Alternative language signs were posted as requi	red by the TCE	EQ.	⊠Yes □ No	
This form must be signed and dated by a designated representative acting on behalf of the applicant after the end of the designated comment period. Send this completed form to the TCEQ to the attention of the Office of the Chief Clerk within 10 business days after the end of the designated comment period. The TCEQ will not accept this form if submitted prior to that date.				
Verified by (signature):				
Applicant: Building Materials Corporation of Americ	c (S)			
Title: Plant Manager Date: 06/19/2014				



Applicant Name: Building Materials Corporation of America		
Site or Facility Name: Dallas Plant		
TCEQ Account Number (if applicable): DB-0378-S	Permit Number:	7711A
Regulated Entity Number (RN): 100788959	Customer Numbe	er (CN): 602717464
For more information regarding public notice, refer to the instru-	ctions in the publi	c notice package.
New Source Review Permit Not (Complete this section, if a		
Proof of publication of the newspaper notices and the requested a been furnished in accordance with the regulations and instruction	⊠ Yes □ No	
Notice of Receipt of Application and Intent to Obtain Pe	rmit (1 st Notice)):
Required signs (for 1st notice) were posted in accordance with the instructions of the TCEQ.	e regulations and	⊠ Yes □ No
A copy of the administratively complete air quality application, as were available for review and copying at the public place indicate throughout the duration of the public comment period.		⊠ Yes □ No
The public place indicated below provides public access to the int nonattainment, or FCAA 112(g) Permit).	ernet (for PSD,	⊠ Yes □ No □ N/A
Notice of Application and Preliminary Decision (2 nd Not	ice, if applicabl	e):
A copy of the complete air quality application (including any substothe application), executive director's preliminary decision (white draft permit), the preliminary determination summary and air quapplicable), are available for review and copying at the public plabelow from the first day after newspaper publication, and will remutil either: (1) the TCEQ acts on the application; or (2) the application is referred to the State Office of Administration (SOAH) for hearing	ch includes the nality analysis (if ce indicated nain available	☐ Yes ☐ No
Name of Public Place: Dallas West Branch Library		
Address of Public Place: 2332 Singleton Boulevard		
City:Dallas State: TX	ZIP Code	e: 75212
This form must be signed and dated by a designated reprapplicant after the end of the designated comment period the attention of the Office of the Chief Clerk within 10 business comment period. The TCEQ will not accept this form if submit	d . Send this comp days <u>after the</u>	oleted form to the TCEQ to end of the designated
Verified by (signature):		
Applicant: Building Materials Corporation of America		
Title: Plant Manager	Date: 06/19/2014	4



Applicant Name:			
Site or Facility Name:			
TCEQ Account Number (if applic	eable):	Permit Number:	
Regulated Entity Number (RN):		Customer Number	r (CN):
For more information regarding	public notice, refer to th	e instructions in th	e public notice package.
	erating Permit (Title omplete this section,		eation
I verify that the required signs we regulations and instructions of the		e with the	Yes No
I verify that proof of publication requested affidavits have been fu and instruction of the TCEQ.	Yes No		
I verify that a copy of the comple subsequent revisions to the appli review and copying at the public duration of the public comment p	☐ Yes ☐ No		
Name of Public Place:			
Address of Public Place:			
City:	State:	ZIP Cod	le:
This form must be signed an the applicant after the end of the TCEQ to the attention of the of the designated comment puthat date.	f the designated com Office of the Chief Clerk	ment period. Sen within 10 busine	d this completed form to ess days after the end
Verified by (signature):			
Applicant:			
Title:		Date:	3





trinityconsultants.com

June 12, 2014

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team

P.O. Box 13087

Austin, Texas 78711-3087

Re: Public Notice Requirements- Affidavits of Publication

NSR Permit Renewal Application Approval and Public Notice Authorization

NSR Permit Number: 7711A

Building Materials Corporation of America. - Dallas Plant - Dallas County

CN 602717464, RN 100788959

To Whom It May Concern:

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility in Dallas, Texas (Dallas Plant). The Plant operates under New Source Review (NSR) Permit No. 7711A issued on October 21, 2004.

GAF submitted a NSR Permit renewal application with Concurrent Permit Alteration for NSR Permit No. 7711A on April 22, 2014. This permit renewal application was declared administratively complete on May 1, 2014. As a part of the air permitting process, the Dallas Plant is required to publish a formal public notice in a newspaper of general circulation in the municipality nearest to the facility location. In accordance with the guidance package received from the TCEQ on May 1, 2014, the Dallas Plant has completed the following:

- Published a formal public notice on May 15, 2014 in the following newspapers circulated in Dallas, Dallas County:
 - o The Dallas Observer (English)
 - o El Extra (Spanish)
- Placed a copy of the permit renewal application, statement of basis, and the draft permit at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Texas, for public viewing and copying, beginning May 15, 2014
- Prepared and posted signs at the Dallas Plant on May 15, 2014
- > Submitted the original newspaper clippings showing publication date and newspaper name in English and Spanish on May 28, 2014

The Dallas Plant is required to submit original Affidavits of Publication within 30 calendar days after the date of publication. As such, the Dallas Plant is submitting the Affidavits of Publication with this letter.

TCEQ - Page 2 June 12, 2014

Photocopies of these submittals are being mailed to the following, per the Instructions for Public Notice:

U.S. Environmental Protection Agency

Region 6

Attn: Air Permits Section (6PD-R) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Texas Commission on Environmental Quality

Air Section Manager

Dallas/Fort Worth Regional Office

2309 Gravel Drive

Fort Worth, Texas 76118-6951

Texas Commission on Environmental Quality

Office of Air

Air Permits Division, MC-163

Ms. Ann Mosher P.O. Box 13087

Austin, Texas 78711-3087

Section Manager

Air Pollution Control Program

City of Dallas Environmental and Health Services

320 East Jefferson Boulevard, Room LL 13

Dallas, Texas 75203-2632

If you have any questions, please feel free to contact me at (972) 661-8100 or Mr. Kevin Bush of GAF at (214) 637-8933.

TRINITY CONSULTANTS

Kilogra Colta

Latha Kambham, Ph.D.

Managing Consultant

cc:

Ms. Ann Mosher, TCEQ Air Permits Division

Ms. Elizabeth Smith, TCEQ Regional Office 4

Mr. David Miller, City of Dallas, Air Pollution Control Program

Mr. Kevin Bush, GAF Mr. Durwin Farlough TCEQ-Office of the Chief Clerk MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

Applicant Name: <u>Build</u>	ing Materials Corporation of America
Permit No.:7711A	

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS	§	
COUNTY OF <u>Dallas</u>	§	
Before me, the undersigned authority, on this	is day personally appeared	
(name of person representing newspa	$\frac{}{per)}$, who being by me duly sworn,	
deposes and says that (s)he is the	le of person representing newspaper)	
of the Dalla Obscribed (name of newspaper)	that said newspaper is generally circu	ılated
in	, Texas; t county) to the location of the facility or the proposed faci	ility)
that the enclosed notice was published in sai	id newspaper on the following date(s):	
5/15/2014		
(new	MUMDMUUM) spaper representative's signature)	
Subscribed and sworn to before me this the	<u>A</u> 8 day of <u>May</u> , 20_	14
to certify which witness my hand and seal of		
RYAN PRIETO Notary Public, State of Texas My Commission Expires February 06, 2018	nt or Type Name of Notary Public	
$\overline{ m Mv}$	Commission Expires	

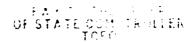
TCEQ-Office of the Chief Clerk MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

Applicant Name: <u>Building Materials Corporation of America</u>	
Permit No.: 7711A	

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING
STATE OF TEXAS §
COUNTY OFDALLAS §
Before me, the undersigned authority, on this day personally appeared
EL EXTRA NEWSPAPER , who being by me duly sworn, deposes (name of person representing newspaper)
and says that (s)he is the PUBLISHER of the
(title of person representing newspaper)
EL EXTRA SPANISH NEWSPAPER that said newspaper or publication is generally circulated (name of newspaper)
in <u>DALLAS, COUNTY OF DALLAS</u> , Texas;
(the municipality or the same county as the location of the facility or the proposed facility)
that the enclosed notice was published in said newspaper or publication on the following date(s):
MAY 15, 2014
(news silva)
(new spap er of publication representative's signature)
Subscribed and sworn to before me this the 15TH day of MAY , 20 14
to certify which witness my hand and seal of office.
as corting winds with continued and scar of office.
(Seal) Notary Public in and for the State of Texas Notary Public in and for the State of Texas ACLISTIN PASTRANA November 05, 2014 ACLISTIN PASTRANA November 05, 2014 ACLISTIN PASTRANA November 05, 2014
Print or Type Name of Notary Public
11-25-2014
My Commission Expires



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 1)



424868 \$23=

I. Applicant Information				
A. Company or Other Legal Name	e: Building Materia	als Corporation of A	America	
Texas Secretary of State Charter/Re	gistration Number	(if applicable):		-
B. Name of Company Official Cor	ntact: Bruce Dahlg	ren		
Title of Company Official Contact: P	lant Manager			
Mailing Address: 2600 Singleton Bl	vd.			
City: Dallas	State: TX		ZIP Code: 75212	
Telephone No.: 214-637-8970	Fax No.: 214-637	-5202	E-mail: bdahlgren@gaf.com	
C. Name of Technical Contact: Ke	evin Bush			
Title of Technical Contact: Environn	nental Engineer			
Company: Building Materials Corpo	ration of America			
Mailing Address: 2600 Singleton Bl	vd.			
City: Dallas	State: TX		ZIP Code: 75212	
Telephone No.: 214-637-8933	Fax No.: 214-637-	-5202	E-mail: kbush@gaf.com	
D. Facility Location Information:	1			···
Street Address: 2600 Singleton Blvd	l.			
If no street address, provide written needed)	driving directions	to the site: (attach	description if additi	ional space is
City: Dallas	County: Dallas		ZIP Code: 75212	•
Latitude (nearest second): 32°46'38'	"N	Longitude (neares	st second): 96°51'48	"W
E. TCEQ Account Identification N	Number: DB-0378-	·S		
F. Is a TCEQ Core Data Form (TC	EQ Form No. 1040	oo) attached?		☐ YES ⊠ NO
G. TCEQ Customer Reference Nu	mber (leave blank	if unknown): 6027	'17464	
H. TCEQ Regulated Entity Number	er (leave blank if u	nknown): 1007889	959	-
L				



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 2)

II. Important General Information					
A.	A. Is confidential information submitted with this application?				
If "YES," is each "CONFIDENTIAL" page marked "CONFIDENTIAL" in large red letters?				⊠ YES □ NO	
В.	B. Is there a related notice of violation, or enforcement action for this facility?			☐ YES ⊠ NO	
If Yes	s, attach a copy of any correspo	ndence from the agency and provide t	he RN in Section I.l	H. above.	
C.	Name of State Senator and Dis	trict Number for this Facility Site:			
Sena	tor Royce West (District 23)				
Nam	e of State Representative and D	sistrict Number for this Facility Site:			
Repr	esentative Eric Johnson (Distri	ct 100)			
		For Concrete Batch Plant	-		
D.	D. Name of the County Judge for this Facility Site:				
Maili	ng Address:				
City:		State:	ZIP Code:		
E. Is the facility located in a municipality or an extraterritorial jurisdiction of a municipality?			☐ YES ☐ NO		
If "YES," list the Name(s) of the Presiding Officer(s) for this Facility Site:					
Maili	ng Address:		•		
City:		State:	ZIP Code:		
III.	III. Facility and Source Information				
A.	A. Site Name: GAF Materials - Dallas Plant				
B. Area Name: Asphalt Coaters					
Туре	ype of Facility: Asphalt Coaters ⊠ PERMANENT ☐ PORTABLE			PORTABLE	
C. Principal Company Product or Business: Asphalt roofing manufacturing					
Primary Standard Industrial Classification (SIC) Code: 2951/2952					
North American Industrial Classification System (NAICS) Code: 324122					



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 3)

	(Failure To Represent All Associated Actions May Require You To Republish Public			
A. Permit Number:	7711A	Permit Expiration Date: October 21, 2014		
B. Permit Type: (ch	B. Permit Type: (check all that apply)			
⊠ State Permit ☐ Flexible Permit ☐ Multiple Plant ☐ Special Permit ☐ Other:				
C. Have permit alterations occurred since originally issued or last renewed?			⊠ YES □ NO	
If "YES," list dates of a	pproval:			
1/26/2009	10/12/2009	5/17/2011	8/18/2011	
1/20/2012	4/5/2013			
D. Have permit am	endments occurred since origin	nally issued or last renewed?	YES \(\) NO	
If "YES," list dates of a	pproval:			
2/13/2007	8/20/2010	6/14/2013		
E. Are there any per	mit actions pending before the T	rceq?	☐ YES ⊠ NO	
If "YES," list actions and dates of submittal:				
	Actions	Dates		
F. Have any qualified facility changes under 30 TAC § 116.116(e) occurred since originally issued or last renewed?			originally YES NO	
G. Are there any associated federal Prevention of Significant Deterioration (PSD), Nonattainment (NA) or major source hazardous pollutants Federal Clean Air Act § 112(g) permits? ☐ YES ☒ NO				
If "YES," list all associa	ated federal permit numbers and	issue or modification dates:		
Federal I	Permit Numbers	Issue or Modification Dates		



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 4)

IV. Type of Permit Renewal and Associat (Failure To Represent All Associated Notice) (continued)	ed Actions Actions May Require You To Republ	ish Public		
I. Are there any Permits by Rule (PBR) or standard exemptions associated with this permit to be rolled in?		☐ YES ⊠ NO		
If "YES," list all associated registration numbers an Note: This precludes applicability of Renewal Cer				
Registration Numbers	Issue Dates	Issue Dates		
I. Are there any standard permits associated wi	th this permit to be rolled in?	☐ YES ⊠ NO		
If "YES," list all associated registration numbers an Note: This precludes applicability of Renewal Cer	d issue dates: tification Option (Section VII).			
Registration Numbers	Issue Dates	Issue Dates		
J. Are there any other permits to be consolidate	d into this permit?	☐ YES 🖾 NO		
If "YES," Indicate the affected permit numbers and Note: This precludes applicability of Renewal Cer	attach a permit renewal application for eatification Option (Section VII).	ch permit:		
Pern	nit Numbers			
IV. Type of Permit Renewal and Associated (Failure to represent all associated ac		Public Notice)		
K. Have any of the following changes been made since it was last amended or renewed?	to or proposed for the facilities covered by	y this permit		
Construction of a new emission source.	☐ YES ⊠ NO			
The emission of new chemical species - a change in	☐ YES ⊠ NO			
An increase in emission rates on a short term or an Criteria pollutant as well as increases of a chemical	☐ YES ⊠ NO			
A change in the method of emission control if the enthermal oxidizer or flare.	mission control is a source itself such as a	☐ YES ⊠ NO		



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 5)

IV.	Type of Permit Renewal and Associated Actions (continued) (Failure to represent all associated actions may require you to republish	Public Notice)
K.	Have any of the following changes been made to or proposed for the facilities covered be since it was last amended or renewed?	y this permit
Are	new pollutants being added in the renewal process, not currently listed in the permit?	☐ YES ⊠ NO
If "Y	ES," list all additional pollutants.	
	ES," to any question in IV. K., a concurrent permit amendment is required before the pewed.	rmit can be
L.	Have emission factors changed since the last permitting action?	☐ YES ⊠ NO
М.	Is this facility located at a site required to obtain a federal operating permit under 30 TAC Chapter 122?	⊠ YES □ NO
	site operating permit (SOP) or general operating permit (GOP) review pending for this ree, area, or site?	☐ YES ⊠ NO
Is aı	n SOP or GOP issued for this source, area, or site?	⊠ YES □ NO
List	SOP or GOP number(s):	
0-2	771	
N.	Are there other actions associated with facilities covered under this permit?	☐ YES ⊠ NO
If "Y	ES," list actions and dates of submittals or approvals:	•
	Actions Dates	
V.	Permit Fee Information	
Fee	Paid for this application:	
Is a	Table 30-R (Estimated Emissions and Fee Certification) attached?	⊠ YES □ NO
	copy of the required fee payment based on annual emission rates attached to the inal submittal of this application?	⊠ YES □ NO



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 6)

VI. Public Notice Informatio	n					
A. Name of Responsible Person: Kevin Bush						
Title of Responsible Person: Environ	mental Engineer					
Mailing Address: 2600 Singleton Blv	⁄d.					
City: Dallas	State: TX		ZIP Code: 75212			
Telephone: 214-637-8933	Fax: 214-637-5202 E-mail: kbush@gaf.com					
B. Name of Technical Contact: Ke	vin Bush			-		
Title of Technical Contact: Environm	ental Engineer					
Mailing Address: 2600 Singleton Blv	d.					
City: Dallas	State: TX		ZIP Code: 75212			
Telephone: 214-637-8933	Fax: 214-637-520	2	E-mail: kbush@gaf	.com		
C. Application in Public Place:						
Name of Public Place: Dallas West B	ranch Library					
Physical Address: 2332 Singleton Bo	ulevard					
City: Dallas County: Dallas						
Has the public place granted authorization to place the application for public viewing and copying?						
D. Small Business Classification:						
Does this company (including parent 100 employees or less than \$6 millio	companies and su n in annual gross r	bsidiary companie eceipts?	s) have fewer than	☐ YES ⊠ NO		
Is the site a major source under 30 T	AC Chapter 122, Fo	ederal Operating Po	ermit Program?	⊠ YES □ NO		
Are the site emissions of any individu	ıal air contaminan	t greater than 50 tp	py?	⊠ YES □ NO		
Are the site emissions of all air conta	minant combined	greater than 75 tpy	?	⊠ YES □ NO		
E. Bilingual Notice Confirmation:						
Is a bilingual program required by th	e Texas Education	Code in the School	District?	⊠ YES □ NO		
Are the children who attend either the facility eligible to be enrolled in a bili				⊠ YES □ NO		
If "YES," which language is required	by the bilingual pr	ogram? Spanish				



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 7)

VII.	Renewal Certification Option	
Α.	Does the permitted facility emit an air contaminant on the watch list? Is the permitted facility located in an area on the watch list?	☐ YES ⊠ NO
В.	Is the permitted facility required to participate in the Houston/Galveston Area (HGA) cap and trade program for highly reactive VOCs? In addition, do the HRVOCs need to be speciated on the maximum allowable emission rates table (MAERT)?	☐ YES ⊠ NO
C.	Does the company have an unsatisfactory compliance history?	☐ YES ⊠ NO
D.	Is the permit a Flexible Permit or an Existing Facilities Flexible Permit?	☐ YES ⊠ NO
Е.	Does this permit require the inclusion of marine loading emissions?	☐ YES ⊠ NO
F.	Is there a concurrent amendment application being submitted for this permit?	☐ YES ⊠ NO
Is the	ere a permit amendment application currently under review for this permit?	☐ YES ⊠ NO
G.	Is the addition of Compliance Assurance Monitoring conditions required with this renewal?	☐ YES ⊠ NO
н.	Are scheduled maintenance startup or shutdown emissions not authorized by PBR or standard permit required to be included in the permit at this time?	☐ YES ⊠ NO
I.	Are any of the following actions requested at the time of renewal:	
1.	Are there any facilities that have been shutdown that are proposed to be removed from the permit at the time of renewal?	☐ YES ⊠ NO
2.	Are there any Permit by Rule authorizations (30 TAC \S 106) that need or are proposed to be incorporated into the permit?	☐ YES ⊠ NO
3.	Have the emissions factors changed for any source or have the emissions calculation methodology changed for any source?	⊠ YES □ NO
4.	Is this permit being consolidated into another permit or are other permits being consolidated into this permit as part of this renewal?	☐ YES ⊠ NO
5.	Is there inclusion of any sources never before identified but always present and previously represented?	☐ YES ⊠ NO
6.	Are there any changes whatsoever to the current permit special conditions or MAERT being proposed?	⊠ YES □ NO
J.	If the answers to any of the questions A through I above are "YES," this option cannot be used proceed to Section VIII. If answers to question in A through I above are "NO," this option should be used. I choose the Renewal Certification Option.	☐ YES ⊠ NO
	ES," to question J, Sections VIII through X are not required; proceed to Sections XI and Σ y of your current permit.	(II and enclosed
*If co	mments are received during the public notice comment period, the Renewal Certification red.	n Option is



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 8)

VIII	. Technical Information					
A.	Is a current area map attached?	⊠ YES □ NO				
Are	any schools located within 3,000 feet of this facility?	⊠ YES □ NO				
В.	Is a plot plan of the facility property attached?	⊠ YES □ NO				
C.	Is a process flow diagram and a process description attached?	⊠ YES □ NO				
D.	Maximum Operating Schedule:					
Hou	rs/Day: <u>24</u> Days/Week: <u>7</u> Weeks/Year: <u>52</u>					
Does	s this facility operate seasonally?	☐ YES ⊠ NO				
If "Y	ES," please describe:					
E.	Are maximum emissions data and calculations attached?	⊠ YES □ NO				
1.	Is a Table 1 (a) (Emission Point Summary Table) attached?	⊠ YES □ NO				
2.	Is a Table 2 (Material Balance Table) attached?	⊠ YES □ NO				
3.	Is equipment, process, or control device tables attached?	☐ YES ⊠ NO				
4.	Are routine maintenance, start-up, or shutdown emissions included?	☐ YES ⊠ NO				
IX.	IX. State Regulatory Requirements Applicants must be in compliance with all applicable state regulations to obtain a permit renewal.					
A.	Is the facility being operated in accordance with all requirements, limits, and conditions of the current permit, including representations in the initial application and any subsequent alterations, amendments, or other authorizations?	⊠ YES □ NO				
Desc	ribe potential or pending authorization(s):	<u> </u>				
B.	Is the facility able to measure emissions of significant air contaminants?	⊠ YES □ NO				
Are o	letails attached?	☐ YES ⊠ NO				
C.	Are all facility emission controls economically reasonable and technically practicable considering the age of the facility?	⊠ YES □ NO				
D.	Is the facility subject to any requirements of 30 TAC Chapter 115?	☐ YES ⊠ NO				
If "Y with	ES," list the rules and attach documentation on how the facility emission controls, and er the rule standards or exemptions.	missions comply				



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 9)

IX.	State Regulatory Requirements (continued) Applicants must be in compliance with all applicable state regulations to obtain a pe	ermit renewal
E.	Is the facility subject to any requirements in 30 TAC Chapter 117?	☐ YES ⊠ NO
If "Y with	ES," list the rules and attach documentation on how the facility emission controls, and en the rule standards or exemptions.	nissions comply
F.	Is this facility located at a site within the Houston/Galveston nonattainment area (Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller Counties)?	☐ YES ☒ NO
Doe: NOx	s the facility at this site have an uncontrolled design capacity to emit 10tpy or more of ?	☐ YES ☐ NO
	is site subject to 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emissions Cap Trade)?	☐ YES ☐ NO
Does	s this action make the site subject to 30 TAC § 101[H][3]?	☐ YES ☐ NO
Does	s this action require the site to obtain additional emission allowances?	☐ YES ☐ NO
X.	Federal Regulatory Requirements Applicants must be in compliance with all applicable federal regulations to obtain a If any of the following questions is answered "YES", list the rules and attach docume the emission controls (if any are required) meet rule requirements, how work practic requirements, calculations or sampling/test data demonstrating compliance with an standards (ppm, lb/MMBtu, g/hp-hr, lb VOC/gallon solids etc.) or continuous emiss system (CEMS) data.	ntation of how ces meet rule ny numerical
Α.	Does a Title 40 Code of Federal Regulations Part 60, (40 CFR Part 60) New Source Performance Standard (NSPS) apply to the facility in this application?	⊠ YES □ NO
В.	Does 40 CFR Part 61, National Emissions Standard for Hazardous Air Pollutants (NESHAP) apply to the facility in this application?	☐ YES ☒ NO
C.	Does 40 CFR Part 63, Maximum Achievable Control Technology (MACT) standard apply to the facility in this application?	⊠ YES □ NO
XI.	Copies of the Application	
Α.	Has the required fee been sent separately with a copy of this Form PI-1R to the TCEQ Revenue Section? (MC 214, P.O. Box 13088, Austin, Texas 78711-3088).	⊠ YES □ NO



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 10)

XI.	Copies of the Application (continued)	
B.	Is the Core Data Form, Form PI-1R, and all attachments being sent to the TCEQ in Austin?	⊠ YES □ NO
Opti beer	ional: Has an extra copy of the Core Data Form, Form PI-1R and all attachments a sent to the TCEQ in Austin?	⊠ YES □ NO
C.	Is a copy of the Core Data Form, the Form PI-1R, and all attachments being sent to the appropriate TCEQ regional office?	⊠ YES □ NO
D.	Is a copy of the Core Data Form, the Form PI-1R, and all attachments being sent to each appropriate local air pollution control program(s)?	⊠ YES □ NO
XII	Delinquent Fees and Penalties	
Offic Pena	ice: This form will not be processed until all delinquent fees and/or penalties owed to the ce of the Attorney General on behalf of the TCEQ is paid in accordance with the "Delingualty Protocol." For more information regarding Delinquent Fees and Penalties, go to the www.tceq.texas.gov/agency/delin/index.html.	uent Fee and
XII	I. Signature	The state of the s
facts know Texa and reso appl haza §§ 74 know	signature below confirms that I have knowledge of the facts included in this application is are true and correct to the best of my knowledge and belief. I further state that to the by wledge and belief, the project for which application is made will not in any way violate a as Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the regulations of the Texas Commission on Environmental Quality or any local governmentation enacted pursuant to the TCAA. I further state that I understand my signature indication meets all applicable nonattainment, prevention of significant deterioration, or rardous air pollutant permitting requirements. I further state that I have read and understand air pollutant permitting requirements. I further state that I have read and understands air pollutant permitting requirements. I further state that I have read and understands air pollutant permitting requirements or representations in this wingly making or causing to be made false material statements or representations in this TWC § 7.187, pertaining to CRIMINAL PENALTIES.	pest of my my provision of the e air quality rules ntal ordinance or licates that this najor source of stand TWC tionally or
Nam	ne: Bruce Dahlgren	
	Print Full Name	
Title	: <u>Plant Manager</u>	
Sign	ature: A Original Signature Required	
Date	: 4/22/2014	

trinityconsultants.com



April 22, 2014

Revenue Section Texas Commission on Environmental Quality Mail Code 214, Building A, Third Floor 12100 Park 35 Circle Austin, TX 78753

RE: NSR Permit Renewal Application Fee, NSR Permit No. 7711A

GAF Materials Corporation- Dallas Plant TCEQ Account Number: DB-0378-S

TCEQ Customer Reference Number: CN602717464 TCEQ Regulated Entity Number: RN100788959

To Whom It May Concern:

Please find enclosed a New Source Review (NSR) Permit Renewal Application Fee (in the amount of \$6,581.24) for GAF Materials Corporation (GAF), located in Dallas, Texas. GAF is submitting an NSR Permit Renewal Application for NSR Permit No. 7711A to the Texas Commission on Environmental Quality (TCEQ) Air Permits Initial Review Team (APIRT) section under separate cover. In addition, please find an enclosed copy of the TCEQ Form PI-1R submitted with the NSR Permit Renewal Application in the Attachment to this letter.

If you have any questions, please feel free to contact me at (972) 661-8100, or Mr. Kevin Bush (GAF) at (214) 637-8933.

Sincerely,

TRINITY CONSULTANTS

(Keipe Colt

Latha Kambham, Ph.D. Managing Consultant

Attachments

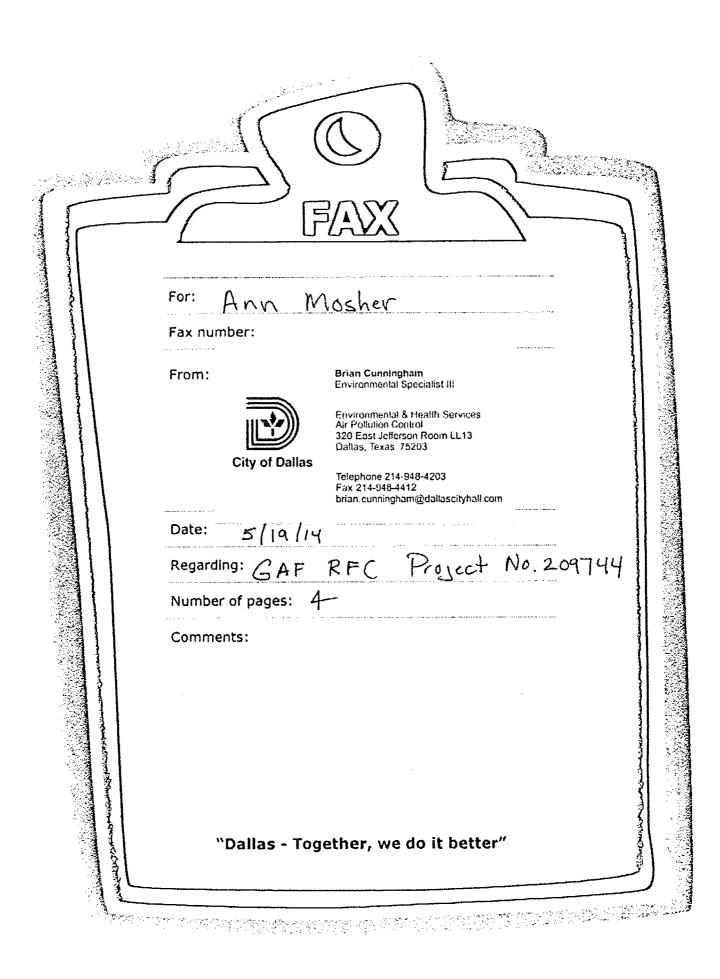
cc: Mr. Kevin Bush, GAF

Mr. Durwin Farlough, GAF

To: 915122391300 05/19/14 10:51 AM

age 1 of 3

From: (2149484412)



From: (2149484412)

	Request for Comments Site Review RESPONSE							
	PLEASE SEND COMMENTS TO THE PERSON IDENTIFIED BELOW. (To avoid delays, please do not send this back to the Air Permits Initial Review Team.):							
	To: Bonnie Evridge - Air Perr	nits Divi	sion – Austin (M/C)	E-Mai	l: <u>Bonni</u> e	Evridge	Ph	one: (512) 239-5222
X	To: Ann Mosher - Air Permit	s Divisio	n – Austin (M/A)	E-Mai	il: <u>Ann M</u>	<u>osher</u>	Ph	one: (512) 239-3753
	To: Steve Akers - Air Permits	Division	ı - Austin (Comb/Coat)	E-Mai	il: Steve	Akers	Ph	one: (512) 239-1141
	To: Rick Goertz / Daniel Smo Austin (Chem)	thers - A	Air Permits Division -		il : <u>Rick G</u> I Smothe		Ph 160	one: (512) 239-5606 / 64
	То:	E-Mail	l:		Phone:			Fax:(512) 239-1300
FF	ROM: Region: 4		City: Dallas			County: D)alla	as
			Compliance:			Legal:		
Co	opy of Application Received	by your	Office: YES NO					
Di	ate Received: 4/23	/14						
P	ERMIT No. 7711A			PRO	JECT N	lo. 209744	1	
T	CEQ ACCOUNT NUMBE	R: DB-	-0378-S					
C	ompany Name: Building	Mater	rials Corporation of	Amer	ica			
In	vestigator's/Compliance Off	icer's N	iame (Please Print):	Bri	an (Connin	Jal	Jam
Oı	rganization:	70	Dallas			Phone: 214	~	948-4203
Cı	Comments Deadline: 5/19/14							
Da	Date of Last Site Visit: 7/24/13							
SI	ITE INFORMATION:							
N	uisance/Odor Potential:	Low _	Moderate High					
E	kisting Odor Problem: Ye	2s	No (If yes, provide	details)			
H	azard Potential: Low _	Mod	erate High					
St	irrounding Land Use:	dust	rial					
	chool within 3,000 feet? 🗸	/	· · · · · · · · · · · · · · · · · · ·):	Schoo	l Name: 💋	115	on middle
D	istance to Nearest Off-Prope	rty Rec	eptor: 40 meter	~				
Re	eceptor Type: Libru	ry						
D	istance from unit to nearest	propert	yline: 20 meters			************		
D	escribe area surrounding the	e site (a	griculture, industrial, re	esident	ial):	mixed -	10	ndustrial
N	OV/NOE INFORMATION	V (conc	erning affected process	unit):		schools		library
Ty	ype of Site: New	Existing	3					
N	OV Issued? No Y	'es				Date:		
Ty	ype of Violation:							
W	as there an NOE for this site	e?:	No Yes			Date:		

To: 915122391300 05/19/14 10:51 AM age 3 of 3

From: (2 49484412)

Please provide any information the permit engineer needs concerning the current NOV, violation, or NOE status
Summarize any recent complaints related to this facility including complaint type and CCEDS number:
Recommendation based on Compliance History: (*For Compliance Use Only)
Proceed with Permit Review Additional Provisions Deny Permit Update Application
SITE REVIEW:
In light of the proximity of sensitive receptors and the surrounding land use, please discuss any concerns you have concerning a facility of this type locating at the proposed site.
MSS Specific Notes:
The following MSS activities in the application are insufficient or inconsistent with our knowledge of MSS at the facility, and why:
The following activities are typically considered planned MSS and are not found in the application. These activities should be added or addressed:

For TCEQ Use Only

Permit Application Routing and Summary Sheet Air Permits

This sheet should accompany all notices to be processed by the office of the chief clerk on the left side of the file folder.

Name of applicant:	Bu	ilding Materials Corporation of America
Facility/ Cita name		CAEM
Facility/ Site name:	•••••	GAF Materials
TCEQ permit number:		
Application received date:	•••••	April 23, 2014
Customer reference number:		CN600717464
Customer reference number	***************************************	
Regulated entity number:	••••••	RN100788959
Account Number: DB-0378-S		
County: Dallas	Region	າ:4
Local program 1: Dallas	Local	program 2:
Permit type: RENEWAL		
Internal program routing Tech. team leader: Ms. Ann Mosher		DI
		Phone no. (512) 239-3753
APIRT team leader: Mr. Johnny Bowers		Date: May 1, 2014
Administratively reviewed by: Ms. Jacque	Scarmarc	Phone no. (512) 239-1084
Administratively complete date:	May 1, 201	14
211		
Public viewing location must have intern	et acces	s: 🗌 Yes 🔯 No
Is 2nd public notice required:	⊠ No	
*0 - 1'		
*801 applies		

For TCEQ Use Only

Applicant and Contact Information

This sheet should accompany all notices to be processed by the office of the chief clerk on the right side of the file folder.

Applicant's main contact and address to be shown on permit:					
Name/Title: Mr. Bruce Dahlgren, Plant Manager					
Company: Building Materials Corporation of A	America				
Street/Road: 2600 Singleton Boulevard					
City/State/Zip: Dallas, Texas 75212-3738					
Telephone: (214) 637-8970	Fax: (214) 637-5202				
Applicant's technical representative/cons	sultant:				
Name/Title: Mr. Kevin Bush, Environmental	Engineer				
Company: Building Materials Corporation of A	America				
Street/Road: 2600 Singleton Boulevard					
City/State/Zip: Dallas, Texas 75212-3738					
Phone: (214) 637-8933					
Person responsible for publishing notice:					
Name/Title: Mr. Bruce Dahlgren, Plant Manag					
Company: Building Materials Corporation of A	America				
Street/Road: 2600 Singleton Boulevard					
City/State/Zip: Dallas, Texas 75212-3738					
Telephone: (214) 637-8970	Fax: (214) 637-5202				

From:

Jacque Scarmardo

Sent:

Thursday, May 01, 2014 10:22 AM

To:

OCC-NSR; 'R6AirPermits@EPA.gov'

Cc: Subject: RFCAIR4; 'joni.keach@dallascityhall.com'
RENEWAL, Building Materials Corporation of America, 7711A, 209744

Attachments:

PN1 - Permit 7711A - Building Materials Corporation of America.docx

Please see Public Notice attached.

From: Jacque Scarmardo

Sent: Thursday, May 01, 2014 10:20 AM

To: 'kbush@gaf.com': 'bdahlgren@gaf.

To: 'kbush@gaf.com'; 'bdahlgren@gaf.com'

Subject: PN1 - Permit 7711A - Building Materials Corporation of America.docx

Attachments: PN1 - Permit 7711A - Building Materials Corporation of America.docx

Please reply to this email to confirm receipt of attached public notice.

From:

Bush, Kevin < KBush@gaf.com>

Sent:

Thursday, May 01, 2014 6:49 AM

To:

Jacque Scarmardo

Cc: Subject: Farlough, Durwin; Emmons, Steve; Latha Kambham

Attachments:

RE: Example A & B - Permit 7711A - Building Materials Corporation of America.docx Example A & B - Permit 7711A - Building Materials Corporation of America...docx;

ATT00001.txt

Mr. Scarmardo,

We have reviewed the attached draft portion of the Notice of Receipt of Application and Intent to Obtain a Permit. We did not find any discrepancies and are approving the document as is.

Thank you,

Kevin Bush

Sr. Environmental Engineer

2600 Singleton Blvd Dallas, TX 75212 (P) 214-637-8933 (C) 469-337-4475

(F)

kbush@gaf.com



From: Jacque Scarmardo [mailto:jacque.scarmardo@tceq.texas.gov]

Sent: Tuesday, April 29, 2014 9:59 AM

To: Bush, Kevin

Subject: Example A & B - Permit 7711A - Building Materials Corporation of America.docx

We have attached a draft portion of the Notice of Receipt of Application and Intent to Obtain a Permit, which contains information relevant to your application. The public notice is a legally approved document and only the items listed below are subject to approval/correction. If draft approval is not received within 2 working days, the notice package will be filed with the Chief Clerks' office "As Is". Please review the following information carefully and provide us with any corrections as soon as possible:

- * facility address or driving directions to the facility
- * hyperlink for the map to facility please confirm the map shows the general vicinity of the facility
- * contaminants list
- * public viewing place (must be in the same county as the facility and may be required to have internet access)
- * for renewal applications, check all previous permitting actions to make sure they are listed in example A
- * contact person and contact information
- * big or small business status (If your answers on your application indicate that you qualify as a small business, you will not receive Example B with your draft or final package)

If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language. Spanish notice templates are available through the Air Permits Division Web site at www.tceq.state.tx.us/permitting/air/nav/air_publicnotice.html. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication.

A delinquent fee/penalty check will be performed before declaring your application administratively complete. Please do not publish until your application has been declared administratively complete or you may be required to re-publish. Once declared administratively complete you will receive an email containing an administratively complete letter and public notice package. Then we will file the original notice package with the Chief Clerk for mailing.

Please reply to send approval via e-mail.

Your prompt response is appreciated.

From: Jacque Scarmardo

Sent: Tuesday, April 29, 2014 9:58 AM

To: 'kbush@gaf.com'

Subject: Example A & B - Permit 7711A - Building Materials Corporation of America.docx **Attachments:** Example A & B - Permit 7711A - Building Materials Corporation of America.docx

We have attached a draft portion of the Notice of Receipt of Application and Intent to Obtain a Permit, which contains information relevant to your application. The public notice is a legally approved document and only the items listed below are subject to approval/correction. If draft approval is not received within 2 working days, the notice package will be filed with the Chief Clerks' office "As Is". Please review the following information carefully and provide us with any corrections as soon as possible:

- * facility address or driving directions to the facility
- * hyperlink for the map to facility please confirm the map shows the general vicinity of the facility
- * contaminants list
- * public viewing place (must be in the same county as the facility and may be required to have internet access)
- * for renewal applications, check all previous permitting actions to make sure they are listed in example A
- * contact person and contact information
- * big or small business status (If your answers on your application indicate that you qualify as a small business, you will not receive Example B with your draft or final package)

If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language. Spanish notice templates are available through the Air Permits Division Web site at www.tceq.state.tx.us/permitting/air/nav/air_publicnotice.html. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication.

A delinquent fee/penalty check will be performed before declaring your application administratively complete. Please do not publish until your application has been declared administratively complete or you may be required to re-publish. Once declared administratively complete you will receive an email containing an administratively complete letter and public notice package. Then we will file the original notice package with the Chief Clerk for mailing.

Please reply to send approval via e-mail.

Your prompt response is appreciated.

From: Jacque Scarmardo

Sent: Monday, April 28, 2014 3:08 PM

To: RFCAIR4

Cc: 'joni.keach@dallascityhall.com'

Subject: Site Review/Request for Comments for Project Number 209744

Attachments: 209744-RFC-04282014_150806.doc

PLEASE DO NOT RESPOND TO THE PERSON SENDING THIS EMAIL.

This is a request for comments. Please submit comments to the individual and within the specified time frame as identified in the attached file.

trinityconsultants.com



April 22, 2014

Air Permits Initial Review Team (APIRT)
Texas Commission on Environmental Quality
12100 Park 35 Circle, MC 161
Building C, Third Floor
Austin, TX 78753

Re: NSR Permit Renewal Application, NSR Permit No. 7711A

GAF Materials Corporation- Dallas Plant TCEO Account Number: DB-0378-S

TCEQ Customer Reference Number: CN602717464

TCEQ Regulated Entity Number: RN100788959



Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility in Dallas, Texas (Dallas Plant). Please find enclosed a New Source Review (NSR) Permit Renewal Application with Concurrent Permit Alteration for NSR Permit No. 7711A. This application is submitted in accordance with Title 30 of the Texas Administrative Code (30 TAC) Chapter 116 and includes the TCEQ Form PI-1R (General Application for Air Permit Renewals) and supporting documentation. As demonstrated in the enclosed permit renewal application, the renewal with concurrent permit alteration meets all of the current applicable regulatory requirements. A permit renewal application fee of \$6,581.24 has been paid to TCEQ by check.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact me at (972) 661-8100, or Mr. Kevin Bush (GAF) at (214) 637-8933.

Sincerely,

TRINITY CONSULTANTS

Killia (Cittle

Latha Kambham, Ph.D. Managing Consultant

Enclosure

cc: Ms. Elizabeth Smith, TCEQ Region 4 (Dallas/Fort Worth)

Mr. David Miller, City of Dallas

Mr. Kevin Bush, GAF

Mr. Durwin Farlough, GAF

TCEQ AIR QUALITY NEW SOURCE REVIEW PERMIT RENEWAL APPLICATION WITH CONCURRENT PERMIT ALTERATION

GAF Materials Corporation > Dallas Plant

GAF MATERIALS CORPORATION

Prepared By:
Durwin Farlough – Engineering Manager
Kevin Bush - Environmental Engineer
Building Materials Corporation of America
2600 Singleton Blvd.
Dallas, Texas 75212
(214) 637-8933
Fax (214) 637-5202

Latha Kambham, Ph.D. – Managing Consultant Lele Bao – Consultant Xu Liu, Ph.D. – Consultant

TRINITY CONSULTANTS
12770 Merit Drive
Suite 900
Dallas, TX 75251
(972) 661-8100

April 2014 Project 144401.0017

CONFIDENTIAL



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ΑP	PENDIX A - PERMIT NUMBER 7711A	

1. EXECUTIVE SUMMARY

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility located in Dallas, Texas (Dallas Plant). GAF operates under Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 602717464. The Dallas Plant has been assigned TCEQ Air Quality Account Number DB-0378-S and Regulated Entity Number (RN) 100788959. The Dallas Plant operates under New Source Review (NSR) Permit No. 7711A, with additional support equipment authorized by a Standard Permit and several Permit By Rule (PBR) authorizations.

Dallas County is currently an attainment or unclassified area for all criteria pollutants except 8-hour ozone standard. The Dallas Plant is an existing minor source with respect to Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR), but is a major source with respect to the federal operating permits program (Title V) due to potential emissions of particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM $_{10}$) and sulfur dioxide (SO $_{2}$) emissions.

With this application, GAF requests to renew Permit No. 7711A. As required by Title 30 of the Texas Administrative Code (30 TAC) Section (§) 116.315(a), a permit renewal application is being submitted at least six months prior to the expiration of the permit. Furthermore, in accordance with 30 TAC Chapter 39 Subchapter K, this renewal application is required to go through public notice.

GAF is not requesting to roll in any PBRs or the Standard Permit with this NSR renewal application. In addition, all emissions from planned startup and shutdown activities associated with facilities or groups of facilities that are authorized by this permit are already authorized in NSR Permit 7711A. The site is currently using PBR 106.263 (*Routine Maintenance, Startup and Shutdown of Facilities, and Temporary Maintenance Facilities*) for authorization of any other planned Maintenance, Startup, Shutdown (MSS) emissions that are authorized under the NSR permit. Therefore, GAF requests that the TCEQ incorporate the PBRs and Standard Permit by reference into the NSR permit.

In this application, site wide emission calculations of carbon monoxide (CO), nitrogen dioxide (NO_X), particulate matter (PM/PM $_{10}$ /PM $_{2.5}$), SO $_{2}$, and volatile organic compound (VOC) are updated with minor changes to reflect the current emissions. The changes to parameters and methodologies used to calculate the emissions since last permit renewal in 2004 are listed below:

- ➤ Heat Input Rate of Emission Point Number (EPN) HTR6: This heater was permitted at 6 million btu per hour (MMBtu/hr). However, the actual heat input rate is 3.97 MMBtu/hr. Therefore, potential emissions are updated to use the actual heat input rate. This results in a decrease in potential emissions.
- ➤ **Rounding of Values:** In last permit renewal, the emissions were rounded to one significant digit for many emission sources, that causing discrepancies since the permitted emissions in the Maximum Allowable Emission Rates Table (MAERT) for the current permit uses 2 significant digits. (e.g., 0.41 tpy was shown as 0.4 in 2004 permit application, and the current MEART shows 0.40 tpy, instead of 0.41 tpy).

The differences between the current calculated emission rates and the emissions permitted under current MAERT in NSR Permit No. 7711A affect the following EPNs:

- ➤ EPN HTR5: Annual emissions (tpy) of NO_X is currently listed as 0.43 in MAERT; it is calculated as 0.44 in current emission calculations.
- ➤ EPN 26B: Annual emissions (tpy) of PM, PM₁₀ and PM_{2.5} are currently listed as 1.26 in MAERT, respectively; the corresponding values are calculated as 1.27, 1.27 and 1.27 in current emission calculations.
- > EPN 28: Annual emissions (tpy) of VOC is listed as 0.10 in MAERT; it is calculated as 0.14 in current emission calculations.

A table summarizing the currently permitted emission rates, proposed emission rates, and changes in emission rates (increases and decreases) from the currently permitted emission rates is provided at the end of this Section. As shown in this table, GAF is not requesting any changes to emission sources and there are no negative impacts from proposed corrections to permitted emission rates, the proposed changes qualify for a permit alteration. **Therefore, GAF requests a concurrent permit alteration to address these discrepancies.**

This application to renew NSR Permit No. 7711A is submitted in accordance with 30 TAC Chapter 116 and includes, TCEQ PI-1R (General Application for Air Permit Renewals), Table 30-R (Estimated Emissions and Fee Certification for Permit Renewals), and all supporting documentation. The permit renewal fees have been submitted to the TCEQ under separate cover.

EPN	FIN	NAME	Air Contaminant Name	Ra			Emission Rate		Emission oposed - Permitted)
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
HTR3	HTR3	T-1 Laminating Adhesive Bulk	NO _x	0.05	0.22	0.05	0.22		
		Storage Tank Heater Vent	SO ₂	0.01	0.01	0.01	0.01		
			PM	0.01	0.02	0.01	0.02		
			PM ₁₀	0.01	0.02	0.01	0.02		
			PM _{2.5}	0.01	0.02	0.01	0.02		
			CO	0.04	0.18	0.04	0.18		
			VOC	0.01	0.01	0.01	0.01		
HTR4	HTR4	T-2 Laminating Adhesive Bulk	NO_x	0.05	0.22	0.05	0.22		
		Storage Tank Heater Vent	SO ₂	0.01	0.01	0.01	0.01		
			PM	0.01	0.02	0.01	0.02		-
			PM_{10}	0.01	0.02	0.01	0.02		
			PM _{2.5}	0.01	0.02	0.01	0.02	-	
			CO	0.04	0.18	0.04	0.18		
			VOC	0.01	0.01	0.01	0.01		-
HTR5	Asphalt Heater for T-14 and T-15 coating Asphalt Storage and Coating Feed Loop	Asphalt Heater for T-14 and T-15	NO _x	0.10	0.44	0.10	0.43		0.01
			SO_2	0.01	0.01	0.01	0.01		-
		PM	0.01	0.03	0.01	0.03			
		PM ₁₀	0.01	0.03	0.01	0.03			
			PM _{2.5}	0.01	0.03	0.01	0.03		
			CO	0.08	0.35	0.08	0.36		-0.01
			VOC	0.01	0.02	0.01	0.02		
BLR5	BLR5	Boiler Vent	NO _x	0.82	3.59	0.82	3.59		
			SO ₂	0.01	0.04	0.01	0.04		
			PM	0.16	0.70	0.16	0.70		
			PM_{10}	0.16	0.70	0.16	0.70		
			PM _{2.5}	0.16	0.70	0.16	0.70		
			CO	1.73	7.58	1.73	7.58		
			VOC	0.11	0.48	0.11	0.48		

EPN	EPN FIN NAME	NAME	Air Contaminant Name	-	oposed Emission Rate Currently Permitted Emission Rate			Change in Emission Rate (Proposed - Currently Permitted)	
			(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	
8	TO1	Thermal Oxidizer Exhaust Stack	NO_x	1.90	8.31	1.90	8.31		
8A	8A		SO ₂	29.35	128.55	29.35	128.55		
		Heat Boiler Stack	PM	2.62	11.46	2.62	11.46		
			PM_{10}	2.62	11.46	2.62	11.46		
			PM _{2.5}	2.62	11.46	2.62	11.46		
			CO	11.34	49.65	11.34	49.65		
			VOC	0.09	0.37	0.09	0.37	-	
WHBLR 1	WHBLR 1	Waste Heat Recovery Boiler Natural Gas Burner Side	NO_x	0.47	2.06	0.47	2.06		
			SO ₂	0.01	0.04	0.01	0.04		
			PM	0.11	0.48	0.11	0.48		
			PM_{10}	0.11	0.48	0.11	0.48		
			PM _{2.5}	0.11	0.48	0.11	0.48		
			CO	1.24	5.43	1.24	5.43		
			VOC	0.08	0.35	0.08	0.35		
CFL	CFL	Coalescing Filter Mist Elimination	PM	0.63	2.76	0.63	2.76	-	
		Systems (to control emissions from	PM_{10}	0.63	2.76	0.63	2.76		
		the Line 1 and Line 3 Asphalt	PM _{2.5}	0.63	2.76	0.63	2.76		
		Coaters) with ESP as backup	VOC	5.76	25.23	5.76	25.23		
1-1	1-1	Line 1 Stabilizer Storage and Heater	PM	0.23	1.01	0.23	1.01		
		Baghouse Stk	PM_{10}	0.23	1.01	0.23	1.01		
			PM _{2.5}	0.23	1.01	0.23	1.01		
1-3	1-3	Line 1 Stabilizer Use Bin Baghouse	PM	0.03	0.13	0.03	0.13		
		Stack	PM_{10}	0.03	0.13	0.03	0.13		
			PM _{2.5}	0.03	0.13	0.03	0.13		
1-4	1-4	Line 1 Surfacing Section Dust	PM	0.59	2.58	0.59	2.58		
		Collector No. 1 Stack	PM_{10}	0.59	2.58	0.59	2.58		
			PM _{2.5}	0.59	2.58	0.59	2.58		

EPN	FIN	NAME	Air Contaminant Name	Proposed Emission Rate		Currently Permitted Emission Rate		Change in Emission Rate (Proposed - Currently Permitted)	
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
1-5	1-5	Line 1 Surfacing Section Dust	PM	0.59	2.58	0.59	2.58		
		Collector No. 2 Stack	PM_{10}	0.59	2.58	0.59	2.58		
			PM _{2.5}	0.59	2.58	0.59	2.58		
1-6	1-6	Line 1 Surfacing Section Dust	PM	0.59	2.58	0.59	2.58		
		Collector No. 3 Stack	PM_{10}	0.59	2.58	0.59	2.58		
			PM _{2.5}	0.59	2.58	0.59	2.58		
COOL1	COOL1	Line 1 Cooling Section (3 stacks)	PM	8.52	37.30	8.52	37.30		
			PM_{10}	8.52	37.30	8.52	37.30		
			PM _{2.5}	8.52	37.30	8.52	37.30		
			VOC	1.65	7.23	1.65	7.23		
25	25	Sand Application Baghouse	PM	1.50	6.57	1.50	6.57		
			PM_{10}	1.50	6.57	1.50	6.57		
			PM _{2.5}	1.50	6.57	1.50	6.57		
26A	26A	Stabilizer Storage Baghouse A	PM	0.15	0.66	0.15	0.70		-0.04
			PM_{10}	0.15	0.66	0.15	0.70		-0.04
			PM _{2.5}	0.15	0.66	0.15	0.70		-0.04
26B	26B	Stabilizer Storage Baghouse B	PM	0.29	1.27	0.29	1.26		0.01
			PM_{10}	0.29	1.27	0.29	1.26		0.01
			PM _{2.5}	0.29	1.27	0.29	1.26		0.01
27	27	Stabilizer Heater Baghouse	PM	0.09	0.39	0.09	0.40		-0.01
			PM_{10}	0.09	0.39	0.09	0.40		-0.01
			PM _{2.5}	0.09	0.39	0.09	0.40		-0.01
28	28	Asphalt Heater	NO _x	0.59	2.58	0.59	2.60		-0.02
			SO_2	0.01	0.02	< 0.01	0.02		
			PM	0.04	0.20	0.04	0.20		
			PM ₁₀	0.04	0.20	0.04	0.20		
			PM _{2.5}	0.04	0.20	0.04	0.20		
			CO	0.49	2.15	0.50	2.20	-0.01	-0.05
			VOC	0.03	0.14	0.03	0.10		0.04

EPN	FIN	NAME	Air Contaminant Name	Proposed Ra			Permitted	Change in Rate (Pro- Currently	oposed -
				(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
FUG1	FUG1	Plantwide Fugitive Emissions	PM	0.91	3.97	0.91	3.97		-
			PM_{10}	0.91	3.97	0.91	3.97		-
			PM _{2.5}	0.91	3.97	0.91	3.97		-
			VOC	0.43	1.88	0.43	1.88		-
COOL3	COOL3	Line 3 Cooling Section (3 stacks)	PM	6.74	29.52	6.74	29.52		-
			PM_{10}	6.74	29.52	6.74	29.52		-
			PM _{2.5}	6.74	29.52	6.74	29.52		-
		VOC	2.76	12.09	2.76	12.09			
HTR6	HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO _x	0.39	1.71	0.60	2.58	-0.21	-0.87
			SO ₂	0.01	0.01	0.01	0.02		-0.01
			PM	0.03	0.13	0.05	0.20	-0.02	-0.07
			PM_{10}	0.03	0.13	0.05	0.20	-0.02	-0.07
			PM _{2.5}	0.03	0.13	0.05	0.20	-0.02	-0.07
			CO	0.33	1.45	0.49	2.16	-0.16	-0.71
			VOC	0.02	0.09	0.03	0.14	-0.01	-0.05
				Net Cha	ange in Emi	ssion Rate	NO _x	-0.21	-0.88
							SO ₂	0.00	-0.01
							PM	-0.02	-0.11
							PM ₁₀	-0.02	-0.11
							PM _{2.5}	-0.02	-0.11
							CO	-0.17	-0.77
							VOC	-0.01	-0.0



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals

(Page 1)

		<u> </u>					
I. Applicant Information							
A. Company or Other Legal Name: Building Materials Corporation of America							
Texas Secretary of State Charter/Re	gistration Number (if applicable):						
B. Name of Company Official Con	ntact: Bruce Dahlgren						
Title of Company Official Contact: P	lant Manager						
Mailing Address: 2600 Singleton Bl	vd.						
City: Dallas	State: TX	ZIP Code: 75212					
Telephone No.: 214-637-8970	Fax No.: 214-637-5202	E-mail: bdahlgren@gaf.com					
C. Name of Technical Contact: K	evin Bush						
Title of Technical Contact: Environr	nental Engineer						
Company: Building Materials Corpo	ration of America						
Mailing Address: 2600 Singleton Bl	vd.						
City: Dallas	State: TX	ZIP Code: 75212					
Telephone No.: 214-637-8933	Fax No.: 214-637-5202	E-mail: kbush@gaf.com					
D. Facility Location Information:							
Street Address: 2600 Singleton Blvd	l .						
If no street address, provide written needed)	driving directions to the site: (attach	description if additional space is					
	•						
City: Dallas	County: Dallas	ZIP Code: 75212					
Latitude (nearest second): 32°46'38	"N Longitude (neare	st second): 96°51'48"W					
E. TCEQ Account Identification 1	Number: DB-0378-S						
F. Is a TCEQ Core Data Form (TC	CEQ Form No. 10400) attached?	☐ YES ⊠ NO					
G. TCEQ Customer Reference Nu	mber (leave blank if unknown): 602	717464					
H. TCEQ Regulated Entity Number (leave blank if unknown): 100788959							



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 2)

II. Important General Information								
A.	A. Is confidential information submitted with this application? ☐ YES ☐ NO							
If "Y	ES," is each "CONFIDENTIAL"	page marked "CONFIDENTIAL" in la	arge red letters?	⊠ YES □ NO				
В.	Is there a related notice of violation, or enforcement action for this facility? ☐ YES ☒ NO							
If Ye	s, attach a copy of any correspo	ndence from the agency and provide	he RN in Section I.l	H. above.				
C.	Name of State Senator and Dis	trict Number for this Facility Site:						
Sena	tor Royce West (District 23)							
Nam	e of State Representative and D	istrict Number for this Facility Site:						
Repi	esentative Eric Johnson (Distri	et 100)						
		For Concrete Batch Plant						
D.	Name of the County Judge for	this Facility Site:						
Mail	ing Address:							
City:		State:	ZIP Code:					
Е.	Is the facility located in a munimunicipality?	cipality or an extraterritorial jurisdic	tion of a	☐ YES ☐ NO				
If "Y	ES," list the Name(s) of the Pres	iding Officer(s) for this Facility Site:						
Mail	ing Address:							
City:		State:	ZIP Code:					
III.	Facility and Source Infor	mation						
A.	Site Name: GAF Materials - Da	llas Plant						
В.	B. Area Name: Asphalt Coaters							
Туре	Type of Facility: Asphalt Coaters							
C. Principal Company Product or Business: Asphalt roofing manufacturing								
Prim	Primary Standard Industrial Classification (SIC) Code: 2951/2952							
Nort	North American Industrial Classification System (NAICS) Code: 324122							



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 3)

IV.	Type of Permit Renewal and Associated Actions (Failure To Represent All Associated Actions May Require You To Republish Public Notice)					
A.	Permit Number: 7711	ıA	Permit Expiration Date: Oc	tober 21, 2	2014	
B.	Permit Type: (check o	all that apply)				
$\boxtimes s$	tate Permit 🗌 Flexible	Permit 🗌 Multiple Plant 🗀	Special Permit 🗌 Other:_			
C.	Have permit <i>alterat</i>	ions occurred since origina	lly issued or last renewed?		⊠ YES □ NO	
If "Y	ES," list dates of appro	val:				
	1/26/2009	10/12/2009	5/17/2011	8,	/18/2011	
	1/20/2012	4/5/2013				
D.	Have permit amend	ments occurred since origin	nally issued or last renewed?		⊠ YES □ NO	
If "Y	ES," list dates of appro	val:				
	2/13/2007	8/20/2010	6/14/2013			
E.	Are there any permit	actions pending before the 1	rceq?		☐ YES ⊠ NO	
If "Y	ES," list actions and da	ites of submittal:				
	Acti	ions	Dat	tes		
F.	Have any qualified fac issued or last renewed		C§ 116.116(e) occurred since o	originally	☐ YES ⊠ NO	
G.	G. Are there any associated federal Prevention of Significant Deterioration (PSD), Nonattainment (NA) or major source hazardous pollutants Federal Clean Air Act § 112(g) permits? ☐ YES ☒ NO					
If "Y	ES," list all associated	federal permit numbers and	l issue or modification dates:			
	Federal Perr	nit Numbers	Issue or Modi	fication I	Dates	



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 4)

IV. Type of Permit Renewal and Associated Actions (Failure To Represent All Associated Actions May Require You To Republish Public Notice) (continued)							
H. Are there any Permits by Rule (PBR) or standard permit to be rolled in?	exemptions associated with this	☐ YES ⊠ NO					
If "YES," list all associated registration numbers and is Note: This precludes applicability of Renewal Certific							
Registration Numbers							
 Are there any standard permits associated with the 	nis permit to be rolled in?	☐ YES ⊠ NO					
If "YES," list all associated registration numbers and is: Note: This precludes applicability of Renewal Certific							
Registration Numbers	Issue Dates						
J. Are there any other permits to be consolidated in	to this permit?	☐ YES ⊠ NO					
If "YES," Indicate the affected permit numbers and atta Note: This precludes applicability of Renewal Certific	ach a permit renewal application for each ation Option (Section VII).	ch permit:					
Permit I	Numbers						
IV. Type of Permit Renewal and Associated A (Failure to represent all associated action	Actions (continued) ns may require you to republish P	ublic Notice)					
K. Have any of the following changes been made to or proposed for the facilities covered by this permit since it was last amended or renewed?							
Construction of a new emission source.		☐ YES ⊠ NO					
The emission of new chemical species - a change in cha	racter of emissions.	☐ YES ⊠ NO					
An increase in emission rates on a short term or annual Criteria pollutant as well as increases of a chemical spe	☐ YES ⊠ NO						
change in the method of emission control if the emission control is a source itself such as a PYES NO nermal oxidizer or flare.							



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 5)

IV. Type of Permit Renewal and Associated Actions (continued) (Failure to represent all associated actions may require you to republish Public Notice)						
K. Have any of the following changes been made to or proposed for the facilities covered by this permit since it was last amended or renewed?						
Are new pollutants being added in the renewal process, not currently listed in the permit?	☐ YES ⊠ NO					
If "YES," list all additional pollutants.						
If "YES," to any question in IV. K., a concurrent permit amendment is required before the perenewed.	rmit can be					
L. Have emission factors changed since the last permitting action?	☐ YES ⊠ NO					
M. Is this facility located at a site required to obtain a federal operating permit under 30 TAC Chapter 122?	⊠ YES □ NO					
Is a site operating permit (SOP) or general operating permit (GOP) review pending for this source, area, or site?	☐ YES ⊠ NO					
Is an SOP or GOP issued for this source, area, or site?	⊠ YES □ NO					
List SOP or GOP number(s):						
O-2771						
N. Are there other actions associated with facilities covered under this permit?	☐ YES ⊠ NO					
If "YES," list actions and dates of submittals or approvals:						
Actions Dates						
V. Permit Fee Information						
Fee Paid for this application:						
Is a Table 30-R (Estimated Emissions and Fee Certification) attached?	⊠ YES □ NO					
Is a copy of the required fee payment based on annual emission rates attached to the original submittal of this application? \boxtimes Y						



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 6)

VI. Public Notice Information							
A. Name of Responsible Person: Kevin Bush							
Title of Responsible Person: Environ	mental Engineer						
Mailing Address: 2600 Singleton Blv	⁄d.						
City: Dallas	State: TX		ZIP Code: 75212				
Telephone: 214-637-8933	Fax: 214-637-520	2	E-mail: kbush@gat	f.com			
B. Name of Technical Contact: Ke	vin Bush						
Title of Technical Contact: Environm	ental Engineer			•			
Mailing Address: 2600 Singleton Blv	⁄d.	,					
City: Dallas	State: TX	·	ZIP Code: 75212				
Telephone: 214-637-8933	Fax: 214-637-5202	2	E-mail: kbush@gaf	.com			
C. Application in Public Place:		•					
Name of Public Place: Dallas West B	ranch Library 🗸						
Physical Address: 2332 Singleton Bo	ulevard						
City: Dallas		County: Dallas					
Has the public place granted authori copying?	zation to place the	application for pub	olic viewing and	⊠ YES □ NO			
D. Small Business Classification:							
Does this company (including parent 100 employees or less than \$6 millio			s) have fewer than	☐ YES ⊠ NO			
Is the site a major source under 30 T	AC Chapter 122, Fe	ederal Operating P	ermit Program?	⊠ YES □ NO			
Are the site emissions of any individu	ual air contaminant	t greater than 50 tp	py?	⊠ YES □ NO			
Are the site emissions of all air conta	?	⊠ YES □ NO					
E. Bilingual Notice Confirmation:							
Is a bilingual program required by th	l District?	⊠ YES □ NO					
Are the children who attend either the facility eligible to be enrolled in a bil		⊠ YES □ NO					
If "YES," which language is required by the bilingual program? Spanish							



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 7)

VII.	Renewal Certification Option			
Α.	Does the permitted facility emit an air contaminant on the watch list? Is the permitted facility located in an area on the watch list?	☐ YES ⊠ NO		
В.	Is the permitted facility required to participate in the Houston/Galveston Area (HGA) cap and trade program for highly reactive VOCs? In addition, do the HRVOCs need to be speciated on the maximum allowable emission rates table (MAERT)?	☐ YES ⊠ NO		
C.	Does the company have an unsatisfactory compliance history?	☐ YES 🖾 NO		
D.	Is the permit a Flexible Permit or an Existing Facilities Flexible Permit?	☐ YES ⊠ NO		
E.	Does this permit require the inclusion of marine loading emissions?	☐ YES ⊠ NO		
F.	Is there a concurrent amendment application being submitted for this permit?	☐ YES ⊠ NO		
Is th	ere a permit amendment application currently under review for this permit?	☐ YES ⊠ NO		
G.	Is the addition of Compliance Assurance Monitoring conditions required with this renewal?	☐ YES ⊠ NO		
Н.	Are scheduled maintenance startup or shutdown emissions not authorized by PBR or standard permit required to be included in the permit at this time?	☐ YES 🖾 NO		
I.	Are any of the following actions requested at the time of renewal:			
1.	Are there any facilities that have been shutdown that are proposed to be removed from the permit at the time of renewal?	☐ YES ⊠ NO		
2.	Are there any Permit by Rule authorizations (30 TAC \S 106) that need or are proposed to be incorporated into the permit?	☐ YES 🖾 NO		
3.	Have the emissions factors changed for any source or have the emissions calculation methodology changed for any source?	⊠ YES □ NO		
4.	Is this permit being consolidated into another permit or are other permits being consolidated into this permit as part of this renewal?	☐ YES ⊠ NO		
5.	Is there inclusion of any sources never before identified but always present and previously represented?	☐ YES ⊠ NO		
6.	Are there any changes whatsoever to the current permit special conditions or MAERT being proposed?	⊠ YES □ NO		
J.	If the answers to any of the questions A through I above are "YES," this option cannot be used proceed to Section VIII. If answers to question in A through I above are "NO," this option should be used. I choose the Renewal Certification Option.	□ YES ⊠ NO		
If "YES," to question J, Sections VIII through X are not required; proceed to Sections XI and XII and enclosed a copy of your current permit.				
*If co	omments are received during the public notice comment period, the Renewal Certificatio ted.	n Option is		



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 8)

VII	I. Technical Information					
A.	Is a current area map attached?	⊠ YES □ NO				
Are	Are any schools located within 3,000 feet of this facility?					
B.	Is a plot plan of the facility property attached?	⊠ YES □ NO				
C.	Is a process flow diagram and a process description attached?	⊠ YES □ NO				
D.	Maximum Operating Schedule:					
Hou	ırs/Day: <u>24</u> Days/Week: <u>7</u> Weeks/Year: <u>5:</u>	2				
Doe	s this facility operate seasonally?	☐ YES ⊠ NO				
If "Y	YES," please describe:					
E.	Are maximum emissions data and calculations attached?	⊠ YES □ NO				
1.	Is a Table 1 (a) (Emission Point Summary Table) attached?	⊠ YES □ NO				
2.	Is a Table 2 (Material Balance Table) attached?					
3.	Is equipment, process, or control device tables attached?					
4.	Are routine maintenance, start-up, or shutdown emissions included?					
IX.	State Regulatory Requirements <i>Applicants must be in compliance with all applicable state regulations to obtain a p</i>	ermit renewal.				
A.	Is the facility being operated in accordance with all requirements, limits, and conditions of the current permit, including representations in the initial application and any subsequent alterations, amendments, or other authorizations?					
Des	cribe potential or pending authorization(s):					
B.	B. Is the facility able to measure emissions of significant air contaminants?					
Are	☐ YES ⊠ NO					
C.	Are all facility emission controls economically reasonable and technically practicable considering the age of the facility?					
D.	Is the facility subject to any requirements of 30 TAC Chapter 115? ☐ YES ☒ NO					
	TES," list the rules and attach documentation on how the facility emission controls, and ϵ the rule standards or exemptions.	emissions comply				



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 9)

IX.	State Regulatory Requirements (continued) Applicants must be in compliance with all applicable state regulations to obtain a pe	rmit renewal			
Ε.	. Is the facility subject to any requirements in 30 TAC Chapter 117?				
	ES," list the rules and attach documentation on how the facility emission controls, and en the rule standards or exemptions.	nissions comply			
		·			
F.	Is this facility located at a site within the Houston/Galveston nonattainment area (Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller Counties)?	☐ YES ⊠ NO			
Does NOx	the facility at this site have an uncontrolled design capacity to emit 10tpy or more of?	☐ YES ☐ NO			
	Is this site subject to 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emissions Cap and Trade)?				
Does	Does this action make the site subject to 30 TAC § 101[H][3]?				
Does	Does this action require the site to obtain additional emission allowances?				
X. Federal Regulatory Requirements Applicants must be in compliance with all applicable federal regulations to obtain a permit renewal. If any of the following questions is answered "YES", list the rules and attach documentation of how the emission controls (if any are required) meet rule requirements, how work practices meet rule requirements, calculations or sampling/test data demonstrating compliance with any numerical standards (ppm, lb/MMBtu, g/hp-hr, lb VOC/gallon solids etc.) or continuous emissions monitoring system (CEMS) data.					
A.	Does a Title 40 Code of Federal Regulations Part 60, (40 CFR Part 60) New Source Performance Standard (NSPS) apply to the facility in this application?	⊠ YES □ NO			
В.	B. Does 40 CFR Part 61, National Emissions Standard for Hazardous Air Pollutants (NESHAP) apply to the facility in this application? ☐ YES ☒ N				
c.	Does 40 CFR Part 63, Maximum Achievable Control Technology (MACT) standard apply to the facility in this application?				
XI.	Copies of the Application				
A.	Has the required fee been sent separately with a copy of this Form PI-1R to the TCEQ Revenue Section? (MC 214, P.O. Box 13088, Austin, Texas 78711-3088).	⊠ YES □ NO			



Texas Commission on Environmental Quality Form PI-1R General Application for Air Permit Renewals (Page 10)

XI.	Copies of the Application (continued)			
В.	Is the Core Data Form, Form PI-1R, and all attachments being sent to the TCEQ in Austin?	⊠ YES □ NO		
	onal: Has an extra copy of the Core Data Form, Form PI-1R and all attachments sent to the TCEQ in Austin?	⊠ YES □ NO		
C.	C. Is a copy of the Core Data Form, the Form PI-1R, and all attachments being sent to the appropriate TCEQ regional office? ☐ YES ☐ NC			
D. Is a copy of the Core Data Form, the Form PI-1R, and all attachments being sent to each appropriate local air pollution control program(s)? ☐ YES ☐ N				
XII.	Delinquent Fees and Penalties			
Offic Pena	ce: This form will not be processed until all delinquent fees and/or penalties owed to the of the Attorney General on behalf of the TCEQ is paid in accordance with the "Delinquent Pees and Penalties, go to the tww.tceq.texas.gov/agency/delin/index.html.	uent Fee and		
XIII	. Signature			
knov Texa and resol appli haza §§ 7. knov	are true and correct to the best of my knowledge and belief. I further state that to the beliedge and belief, the project for which application is made will not in any way violate as Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the regulations of the Texas Commission on Environmental Quality or any local governmentation enacted pursuant to the TCAA. I further state that I understand my signature increation meets all applicable nonattainment, prevention of significant deterioration, or redous air pollutant permitting requirements. I further state that I have read and under 177-7.183, which defines CRIMINAL OFFENSES for certain violations, including intendingly making or causing to be made false material statements or representations in the TWC § 7.187, pertaining to CRIMINAL PENALTIES.	iny provision of the e air quality rules ntal ordinance or licates that this najor source of stand TWC tionally or		
Nam	e: Bruce Dahlgren Print Full Name			
Title	Plant Manager			
Sign	ature: B Original Signature Required			
Date	4/22/2014			

3. TCEQ TABLE 30-R - PERMIT APPLICATION FEE

Per 30 TAC §116.313, the permit renewal fee is calculated based on total annual allowable emissions from the permitted facility to be renewed. The permit renewal fee is calculated as \$6581.24 and is documented in the enclosed TCEQ Table 30-R. A copy of the check is provided at the end of this section.

Table 30-R Estimated Emissions and Fee Certification for Permit Renewals Title 30 Texas Administrative Code § 116.313

<u>Renewal Fees</u> - Each permit renewal requires an application fee that is based upon the amount of annual allowable emissions represented in the application. The total emissions must include those represented in any permit by rule (PBR) or standard permits rolled into the renewal. The following table may be used to calculate renewal fees.

To calculate the fee, multiply the number of tons in excess of the minimum limit of the appropriate category by the incremental fee, then add this amount to the base fee. For example, if total emissions of all air contaminants are 50 tons per year, the total fee would be \$1,993 (base fee of \$1,265, plus incremental fee of \$28 x 26 tons or \$728).

Renewal Fee Table

Tons Per Year (tpy)	Incremental Fee	Base Fee
tpy is equal to or less than 5 tpy	N/A	\$600
tpy is greater than 5 tpy but less than or equal to 24 tpy	\$35/ton	\$600
tpy is greater than 24 but less than or equal to 99 tpy	\$28/ton	\$1,265
tpy is greater than 99 tpy but less than or equal to 651 tpy	\$12/ton	\$3,365
tpy is greater than 651 tpy	N/A	\$10,000

			367.02					
			(Tons per ye	ear)	<u>-</u> _			
268.02	x	\$	12	+ \$	3365	= \$	6581.24	
(Tons per year over the minimum limit)	· •-	((Incremental Fee)		(Base Fee)		(Renewal Fee)

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which this application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Commission on Environmental Quality or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. I further state that I have read and understand TWC §§ 7.177-7.183, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC § 7.187, pertaining to CRIMINAL PENALTIES.

Signature: Company:	Building Materials Corporation of America	Date:	4/22/2014
	wal application fee (from table above) = $\$$ 6581.24		

4. PROCESS DESCRIPTION & PROCESS FLOW DIAGRAM

GAF is a nationwide manufacturer of building material products. The GAF Dallas Plant manufactures asphalt shingles for the roofing industry. There are two asphalt roofing lines at the GAF Dallas Plant: Line 1 and Line 3. A process flow diagram for each Line is included at the end of this Section. The following sections describe the processes associated with the Dallas Plant.

4.1. Still Yard Operations

Asphalt flux is received in bulk by truck or railcar and unloaded into Asphalt Flux Tanks T-110 and T-120. Emissions from the Asphalt Flux Tanks T-110 and T-120 are vented to the thermal oxidizer, with a control efficiency of 98%. Fugitive emissions from piping associated with the asphalt flux tanks are also vented to the thermal oxidizer.

From the asphalt flux storage tanks, asphalt is transferred and blended in Blended Asphalt Flux Tank T-8. Air emissions from the Blended Asphalt Flux Tank T-8 are vented to the thermal oxidizer. The blended asphalt flux is then transferred to Heated Asphalt Day Tanks T-9 and T-10. Emissions from these heated day tanks are routed to the thermal oxidizer. Some of the blended asphalt is shipped off-site via trucks. Emissions from the truck loading operations are controlled using a vapor recovery system pulling a negative pressure across the tanks. The vapor recovery system is routed to the thermal oxidizer.

Heated asphalt flux is conveyed from Heated Asphalt Day Tanks T-9 and T-10 to Blowstills T-13 and T-26. Air emissions from asphalt blowing are routed to the thermal oxidizer with 98% destruction efficiency. The hot exhaust gases from the thermal oxidizer are either vented to atmosphere from the thermal oxidizer exhaust stack (EPN 8) or are ducted to a waste heat boiler to produce steam for the facility. The waste heat boiler is a two (2) chamber design: one side recovers the thermal oxidizer exhaust heat to produce steam while the other side is equipped with an independent 15 MMBtu/hr low NO_x natural gas burner, which is fired if necessary to supplement the steam produced from recovery of the waste heat in order to meet the facility's steam requirements. The two sides of the waste heat boiler operate totally independent of each other and each side has its own exhaust stack which is independent of the thermal oxidizer stack (EPN 8). When the hot exhaust gases from the thermal oxidizer are routed to the waste heat boiler, the exhaust is vented out through EPN 8A (Thermal Oxidizer Exhaust Thru Waste Heat Boiler). The natural gas burner side releases products of natural gas combustion only from EPN WHBLR1 (Waste Heat Recovery Boiler Natural Gas Burner Side. A process flow diagram for the Thermal Oxidizer and Waste Heat Boiler is included at the end of this section.

From the asphalt blowstills, the blown asphalt is transferred to Asphalt Coating Tanks T-14 and T-15. An asphalt heater (EPN HTR5) is used to heat Tanks T-14 and T-15. Each asphalt coating tank routes its emissions to the thermal oxidizer. Asphalt coating is then sent to the mixers in Asphalt Roofing Lines 1 and 3 where asphalt coating is blended with stabilizer (i.e., crushed limestone) before being applied to the fiberglass matt.

A Standby Boiler (EPN BLR5) is operated for back-up purposes. The Standby Boiler is used when the Thermal Oxidizer (EPN 8A) and the Waste Heat Boiler (EPN WHBLR1) units are shut down.

4.2. Asphalt Roofing Line 1

In Asphalt Roofing Line 1, a dry non-woven fiberglass mat is fed into the roofing machine from an unwind stand. A mechanical splicer and an accumulator are provided allowing the rolls to be fed in sequence by splicing without interruption of the operation. The unwind stand and the accumulator are vented to three Line 1 Surfacing Baghouses (EPNs 1-4, 1-5, and 1-6).

The fiberglass mat is next carried through the coating section, where coating asphalt mixed with stabilizer (i.e., crushed limestone) is applied to both surfaces of the mat. This section of the machine is vented to a coalescing filter mist elimination system (CECO) (EPN CFL) with an Electrostatic Precipitator (ESP) (EPN 34) as backup.

The coating section is immediately followed by the surfacing section. In the surfacing area, ceramic colored granules are blended and dropped in proper sequence onto the coated web and embedded. The back surface of the sheet is sprinkled with sand to prevent it from adhering to rolls and to itself in the finished package. This area is vented through an assortment of hooded pick-ups to the Line 1 Surfacing Baghouses (EPNs 1-4, 1-5, and 1-6).

The hot sheet, now with a mineralized surface, travels into the cooling section of the machine. Cooling is achieved by passing the web over a series of water cooled drums, through water mist sprays, and through air jets, which results in flash cooling as the light water spray becomes steam. It is then accumulated in festoons in the looper section of the machine to provide surge capacity required prior to cutting. Water vapor and fugitive emissions in this area are vented to the atmosphere using exhaust fans (Line 1 Cooling Section, EPN COOL1).

Self-seal asphalt based dots are applied to the asphalt roofing before it is cut into shingles and automatically packaged. Though not in current use, adhesive dots may also be applied to the roofing material (for manufacture of laminated shingles) before the shingles are cut and packaged.

Fugitive emissions from Asphalt Roofing Line 1 are released into the production building and eventually make their way to the atmosphere via windows, doorways, and vents in the building (EPN BUILD).

4.3. Line 1 Sand and Granule Storage

Sand and granules are transferred from the sand storage silo and the granule storage silo to the corresponding sand and granule bins located over the roofing machine. Air emissions from back surfacing storage (i.e., sand) and granule storage are routed to the Line 1 Surfacing Baghouses (EPNs 1-4, 1-5, and 1-6) as mentioned above.

4.4. Line 1 Stabilizer Storage

Stabilizer for Asphalt Roofing Line 1 is received in bulk by truck or railcar and is unloaded into a storage silo. From the stabilizer storage silo, stabilizer is conveyed into a stabilizer heater. Air emissions from the stabilizer storage silo and stabilizer heater are both routed to a dust collector (EPN 1-1). Stabilizer in the stabilizer heater is then sent to the stabilizer use bin before being conveyed to a mixer where the stabilizer is mixed with blown coating asphalt. Air emissions from the stabilizer use bin are routed to a dust collector (EPN 1-3), and emissions from the mixer are vented to the Line 1 Surfacing Baghouses (EPNs 1-4, 1-5, and 1-6).

The mixture of heated stabilizer and the coating asphalt is transferred to a surge tank and recirculated through the coater. The air emissions from the coater are controlled by coalescing filter mist elimination systems (CECO) (EPN CFL) with an Electrostatic Precipitator (ESP) (EPN 34) as backup.

4.5. Asphalt Roofing Line 3

In Asphalt Roofing Line 3, a dry non-woven fiberglass mat is fed into the roofing machine from an unwind stand. A mechanical splicer and an accumulator are provided so that the rolls can be fed in sequence by splicing without interruption of the operation. The unwind stand and the accumulator are vented to a dust collector (EPN 25).

The fiberglass mat is next carried through the coating section, where coating asphalt mixed with stabilizer (i.e., crushed limestone) is applied to both surfaces of the mat. This section of the machine is vented to a coalescing filter mist elimination system (CECO) (EPN CFL) with an Electrostatic Precipitator (ESP) (EPN 34) as backup.

The coating section is immediately followed by the surfacing section. In the surfacing area, ceramic colored granules are blended and dropped in proper sequence onto the coated web and embedded. The back surface of the sheet is sprinkled with sand to prevent it from adhering to rolls and to itself in the finished package. This area is vented through an assortment of hooded pick-ups to a dust collector (EPN 25).

The hot sheet, now with a mineralized surface, travels into the cooling section of the machine. Cooling is achieved by passing the web over a series of water cooled drums, through water mist sprays and between air jets, which results in flash cooling as the light water spray becomes steam. It is then accumulated in festoons in the looper section of the machine to provide surge capacity required prior to cutting. Water vapor and fugitive emissions in these areas are vented to the atmosphere using exhaust fans (Line 3 Cooling Section, EPN COOL3).

Self-seal asphalt based dots are applied to the asphalt roofing before it is cut into shingles and automatically packaged. Adhesive stripes are applied to the laminated shingles in Line 3 before the shingles are cut and packaged.

Fugitive emissions from Asphalt Roofing Line 3 are released into the production building and eventually make their way to the atmosphere via windows, doorways, and vents in the building (EPN BUILD).

4.6. Line 3 Sand and Granule Storage

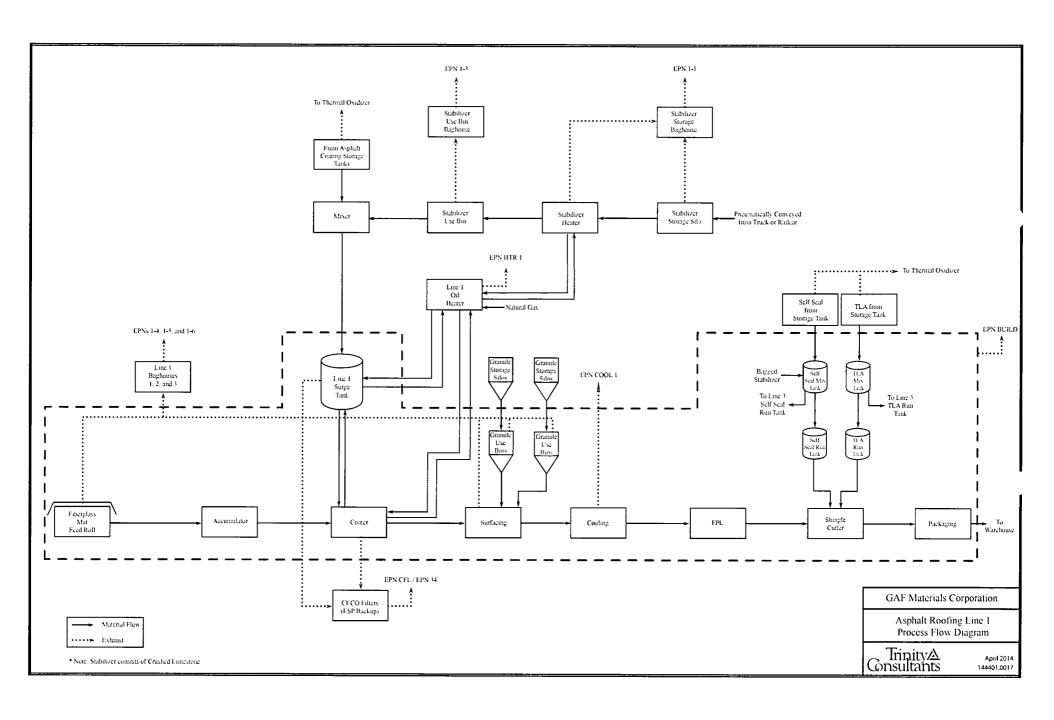
Sand and granules are transferred from the sand storage silo and the granule storage silo to the corresponding sand and granule bins located over the roofing machine. Air emissions from back surfacing storage (i.e., sand) and granule storage are routed to a dust collector (EPN 25) as mentioned above.

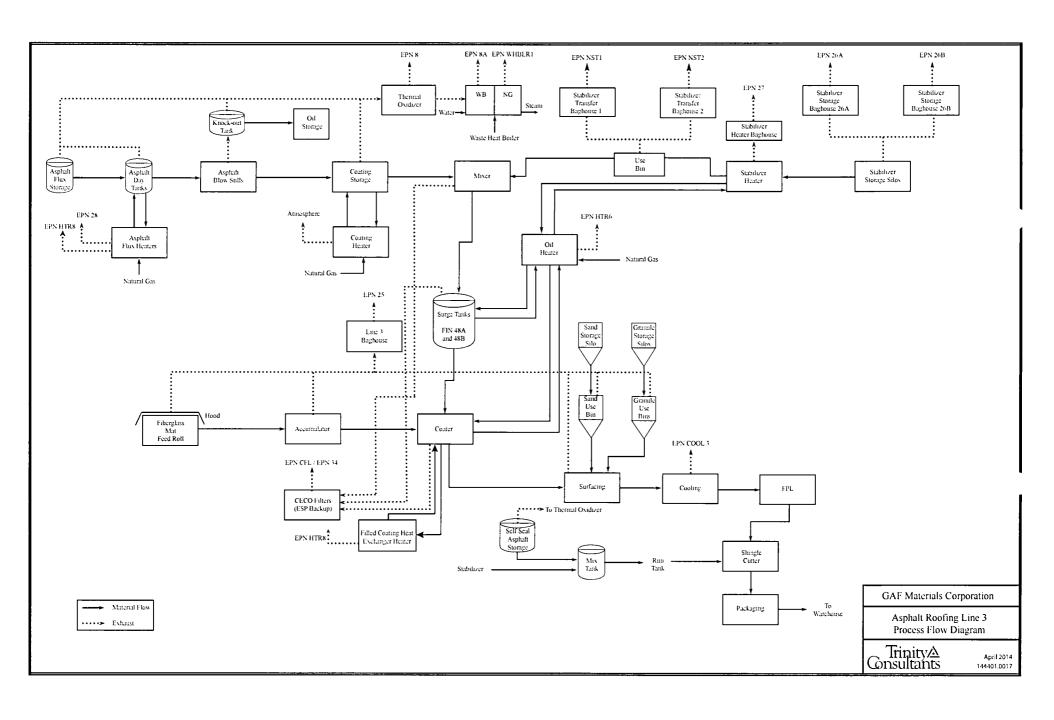
4.7. Line 3 Stabilizer Storage

Stabilizer is received in bulk by truck or railcar and is unloaded into storage silos. Air emissions from the stabilizer storage silos are vented to two dust collectors (EPNs 26A and 26B). The ducting from the two stabilizer storage silos is interconnected. Therefore, both dust collectors control emissions from both stabilizer storage silos.

Stabilizer in the stabilizer storage silos is conveyed into a stabilizer heater. Air emissions from the stabilizer heating are routed to a dust collector (EPN 27). After heating, the stabilizer is conveyed to a mixer where it is mixed with blown coating asphalt. Air emissions from the mixer are routed to a coalescing filter mist elimination system (CECO) (EPN CFL) with an Electrostatic Precipitator (ESP) (EPN 34) as backup. A Minestrina oil heater (EPN HTR6) is used to provide the heat required for the stabilizer heater and the asphalt coater.

The mixture of heated stabilizer and the coating asphalt is transferred to surge tanks and recirculated through the coater. The air emissions from the coater are controlled by a coalescing filter mist elimination system (CECO) (EPN CFL) with an Electrostatic Precipitator (ESP) (EPN 34) as backup.





This section provides a summary of the applicable state regulatory requirements outlined in 30 TAC §116.111, *General Application* (effective October 7, 2010) and 30 TAC §116.311 *Permit Renewal Application* (effective September 12, 2002).

8.1. General Application Requirements (30 TAC §116.111)

8.1.1. Form PI-1 General Application (30 TAC §116.111(a)(1))

A TCEQ Form PI-1 is not needed for this facility since it is not an initial or amendment application.

8.1.2. Protection of Public Health and Welfare (30 TAC §116.111(a)(2)(A)(i))

GAF will comply with all rules and regulations of the commission and with the intent of the Texas Clean Air Act (TCAA), including protection of the health and property of the public. A review of potentially applicable rules is provided below.

8.1.3. Protection of Public Health and Welfare (30 TAC \$116.111(a)(2)(A)(II))

As indicated on the area map in Section 10, there are several schools located within 3,000 feet of the Dallas Plant. However, GAF is not requesting any changes to emission sources and the renewal application does not result in any increases to currently permitted emission rates.

8.1.4. Measurement of Emissions (30 TAC 116.111(a)(2)(B))

GAF will make necessary provisions for measuring the emissions of significant air contaminants from the Dallas Plant to demonstrate ongoing compliance with permit limitations if required by the Executive Director. GAF understands that enforceable permit provisions will be based on measures, which will provide for adequate demonstration of continuous compliance.

8.1.5. Best Available Control Technology (30 TAC 116.111(a)(2)(C))

BACT is not required since this permitting action is a concurrent permit alteration and renewal only.

8.1.6. New Source Performance Standards (30 TAC 116.111(a)(2)(D))

The waste heat recovery boiler (EPN WHBLR1) and Standby Boiler (EPN BLR5) are subject to the requirements of New Source Performance Standards (NSPS) Subpart Dc- Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The Dallas Plant will continue to comply with the recordkeeping and reporting requirements of this regulation. The Line 3 Asphalt Operations are subject to NSPS UU in Title 40 of the Code of Federal Regulations (40 CFR) Part 60. GAF will continue to ensure that the Line 3 Asphalt Operations meet the requirements set forth in this Subpart.

8.1.7. National Emissions Standards for Hazardous Air Pollutants (30 TAC 116.111(a)(2)(E) & (F))

The Dallas Plant is not a major source for hazardous air pollutants (HAP) emissions; therefore, the Plant is not subject to Subpart LLLLL (Asphalt Processing and Asphalt Roofing Manufacturing).

The Line 1 and Line 3 Asphalt Operations in the Dallas Plant are subject to National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63 Subpart AAAAAAA) since the Dallas Plant is an area source of HAP emissions. The Dallas Plant will continue to ensure that these asphalt operations meet the requirements of this regulation.

8.1.8. Performance Demonstration (30 TAC 116.111(a)(2)(G))

The Dallas Plant will submit additional engineering data or perform ambient monitoring or stack testing if required by the TCEQ to confirm performance as represented in the permit application.

8.1.9. Nonattainment Review (30 TAC 116.111(a)(2)(H))

The GAF Dallas Plant is located in Dallas County, Texas, which is currently classified as a moderate nonattainment area for the 8-hour ozone standard and is unclassified for all criteria pollutants. The Dallas Plant is currently an existing minor source with regards to Nonattainment New Source Review (NNSR). As shown in the emission calculations in section 5, the site-wide emissions of NO_X and VOC are below major source thresholds for NNSR. Therefore, NNSR does not apply to this application.

8.1.10. Prevention of Significant Deterioration Review (30 TAC 116.111(a)(2)(I))

The Dallas Plant is currently an existing minor source with regards to Prevention of Significant Deterioration (PSD) review. As shown in the emission calculations presented in section 5, the site-wide emissions of pollutants for which the area is in attainment or unclassified are below major source thresholds for PSD review. Therefore this requirement does not apply.

8.1.11. Air Dispersion Modeling (30 TAC 116.111(a)(2)(J))

The Dallas Plant will provide air dispersion modeling upon the request of the Executive Director of the TCEQ. Given the magnitude of emissions from the Dallas Plant, GAF believes that the site will comfortably show compliance with all applicable air quality standards.

8.1.12. Hazardous Air Pollutants (30 TAC 116.111(a)(2)(K))

This regulation applies to new major and reconstructed sources of HAPs that are not subject to a Maximum Achievable Control Technology (MACT) standard when they are constructed or reconstructed. The Dallas Plant has no affected sources that meet these criteria. Therefore, this rule does not apply.

8.1.13. Mass Cap and Trade Allowances (30 TAC 116.111(a)(2)(L))

This regulation refers to Chapter 101, Subchapter H, Division 3, which applies to facilities in the Houston-Galveston-Brazoria ozone nonattainment area. The Dallas Plant is not located in the Houston-Galveston-Brazoria ozone nonattainment area. Therefore, the provisions of this regulation do not apply.

8.1.14. Notice Requirements (30 TAC 116.111(b))

GAF will comply with all applicable notice requirements under Chapter 39 and Chapter 55 associated with this permit renewal application.

8.2. General Requirements - Permit renewal Application (30 TAC §116.311)

Per TCEQ Form PI-1R (General Application for Air Permit Renewals), permit renewal applications must address the requirements outlined in 30 TAC §116.311, Permit Renewal Application. Each of these requirements is addressed below.

8.2.1. Dockside Vessel Emissions - 30 TAC \$116.311(a)(1)

There are no dockside vessel emissions associated with the Dallas Plant. Therefore, this requirement does not apply.

8.2.2. Operation in Accordance with Permit - 30 TAC §116.311(a)(2)

The Dallas Plant will operate in accordance with all requirements and conditions of the existing permit, including representations in the application for permit to construct and subsequent amendments.

8.2.3. New Source Performance Standards - 30 TAC \$116.311(a)(3)

The waste heat recovery boiler (EPN WHBLR1) and Standby Boiler (EPN BLR5) are subject to the requirements of NSPS Subpart Dc- Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The Dallas Plant will continue to comply with the recordkeeping and reporting requirements of this regulation. The Line 3 Asphalt Operations are subject to NSPS UU in 40 CFR Part 60. GAF will continue to ensure that the Line 3 Asphalt Operations meet the requirements set forth in this subpart.

8.2.4. National Emissions Standards For Hazardous Air Pollutants (30 TAC §116.311(A)(4),(5) and (6))

The Dallas Plant is not a major source for hazardous air pollutants (HAP) emissions; therefore, the Plant is not subject to Subpart LLLLL (Asphalt Processing and Asphalt Roofing Manufacturing).

The Line 1 and Line 3 Asphalt Operations in the Dallas Plant are subject to National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing (40 CFR Part 63 Subpart AAAAAAA) since the Dallas Plant is an area source of HAP emissions. The Dallas Plant will continue to ensure that these asphalt operations meet the requirements of this regulation.

8.2.5. Avoidance of Condition of Air Pollution (30 TAC §116.311(b))

Upon request from the Executive Director, GAF will submit additional information regarding the emissions from the Dallas Plant and impacts on the surrounding area. GAF understands that the TCEQ will impose as a condition of renewal only those requirements determined to be economically reasonable and technically practicable considering the age of the facility and impacts on the surrounding area.

8.2.6. Compliance History (30 TAC \$116.311(c))

GAF understands that a compliance history review must be conducted in accordance with 30 TAC Chapter 60.

8.3. General Air Quality Rules (30 TAC Chapter 101)

The Dallas Plant will operate in compliance with all applicable requirements of the TCEQ General Rules provided in 30 TAC Chapter 101.

8.4. Control of Visible Emissions and Particulate Matter (30 TAC Chapter 111)

Visible emissions and particulate matter emissions from the GAF Dallas Plant will comply with all applicable sections of 30 TAC Chapter 111. 30 TAC Chapter 111 contains PM limits for non-agricultural sources in 30 TAC §111.151. The Dallas Plant will comply with all applicable requirements set forth in this section.

8.5. Control of Air Pollution from Sulfur Compounds (30 TAC Chapter 112)

Sulfur dioxide emissions from the Dallas Plant are subject to the net ground level concentration limits in 30 TAC §112.3. The Dallas Plant will comply with all applicable requirements set forth in this section.

8.6. Standards of Performance for Hazardous Air Pollutants and for Designated Facilities and Pollutants (30 TAC Chapter 113)

The Dallas Plant not subject to any of the requirements in 30 TAC Chapter 113.

8.7. Control of Air Pollution from Motor Vehicles (30 TAC Chapter 114)

The provisions in 30 TAC Chapter 114 regulate emissions from motor vehicles and are not intended for industrial emissions to the atmosphere. Therefore, this regulation does not apply to the Dallas Plant.

8.8. Control of Air Pollution from Volatile Organic Compounds (30 TAC Chapter 115)

The Dallas Plant operations may be subject to Chapter 115 Subchapter B, Division 2, *Vent Gas Control*. However, per 30 TAC §115.127(a)(2)(A), the Dallas Plant is exempt from the vent gas requirements of §115.121(a)(1) (and all other requirements in Chapter 115, Subchapter B, Division 2, except for §115.126(3)), since the Dallas Plant does not generate a vent gas stream having a combined weight of VOCs more than 100 pounds in any continuous 24-hour period. GAF will maintain the records required by §115.126(3).

8.9. Control of Air Pollution by Permits for New Construction or Modification (30 TAC Chapter 116)

This permit renewal application for the Dallas Plant is submitted to renew NSR Permit No. 7711A. No new construction or modification is proposed as part of the renewal application. Therefore, the provisions of these rules do not apply.

8.10. Control of Air Pollution from Nitrogen Compounds (30 TAC Chapter 117)

The 30 TAC Chapter 117 provisions for major commercial, institutional, and industrial sources are applicable to existing major stationary sources of NO_x located in ozone non-attainment areas in Texas. The Dallas Plant is located in Dallas County, an area designated as moderate non-attainment for ozone by the U.S. EPA. The Dallas Plant is not a major source of NO_x , and does not operate any stationary, reciprocating internal combustion engines per §117.2100. Therefore, the provisions of 30 TAC Chapter 117 do not apply to the Dallas plant.

8.11. Control of Air Pollution Episodes (30 TAC Chapter 118)

The Dallas Plant will comply with the rules relating to generalized and localized air pollution episodes, if such an episode is declared by the TCEQ.

Emission reduction plan requirements apply to major stationary sources in El Paso, Galveston, Harris, Jefferson, and Orange Counties. The Dallas Plant is located in Dallas County, which is not a designated county under §118.5; therefore, no emissions reduction plan is required.

8.12. Federal Operating Permits (30 TAC Chapter 122)

GAF operates under Title V Operating Permit Number 0-2771 issued on April 18, 2011. The facility will continue to comply with all applicable provisions of 30 TAC Chapter §122.

This section addresses the applicability of the following parts of Title 40 of the Code of Federal Regulations (40 CFR) for the equipment affected by this permit renewal application:

- > New Source Performance Standards (NSPS) in 40 CFR Part 60
- > National Emissions Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 61
- > NESHAP in 40 CFR Part 63, i.e., Maximum Achievable Control Technology (MACT) rules

9.1. New Source Performance Standards

The NSPS subparts in 40 CFR Part 60 require new, modified, or reconstructed sources to control emissions to the level achievable by the best demonstrated technology as specified in the applicable provisions. As noted in Section 8.1.6, the waste heat recovery boiler (EPN WHBLR1) and Standby Boiler (EPN BLR5) are subject to the requirements of NSPS Subpart Dc- Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The Dallas Plant will continue to comply with the recordkeeping and reporting requirements of this regulation. The Line 3 Asphalt Operations are subject to NSPS UU in 40 CFR Part 60. GAF will continue to ensure that the Line 3 Asphalt Operations meet the requirements set forth in this Subpart.

9.2. National Emission Standards for Hazardous Air Pollutants

The Dallas Plant is not subject to any applicable NESHAP subparts in 40 CFR Part 61.

The NESHAP, codified in 40 CFR Part 63, establish HAP standards for specific industrial source types located at either a major source of HAPs or designated area sources (where site-wide emissions are below the 10 tpy/25 tpy HAP PTE threshold). The following MACT subparts in 40 CFR Part 63 are potentially applicable to the emission sources at the Dallas Plant:

Subpart	Description	Applicability
Subpart A	General Provisions	Yes
Subpart LLLLL	NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing	No
Subpart AAAAAAA	NESHAP for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing	Yes

Table 9-1. Potentially Applicable MACT Subparts

Each potentially applicable MACT subpart of 40 CFR Part 63 is discussed in the subsections below.

9.2.1. 40 CFR 63 Subpart A - General Provisions

The general provisions of 40 CFR Part 63 are located in Subpart A. This subpart contains the provisions defined for NESHAP in Section 112(b) of the Clean Air Act. All affected sources are subject to the general provisions of NESHAP Subpart A unless specifically excluded by the source-specific NESHAP.

9.2.2. 40 CFR 63 Subpart LLLLL - NESHAP for Asphalt Processing and Asphalt Roofing Manufacturing

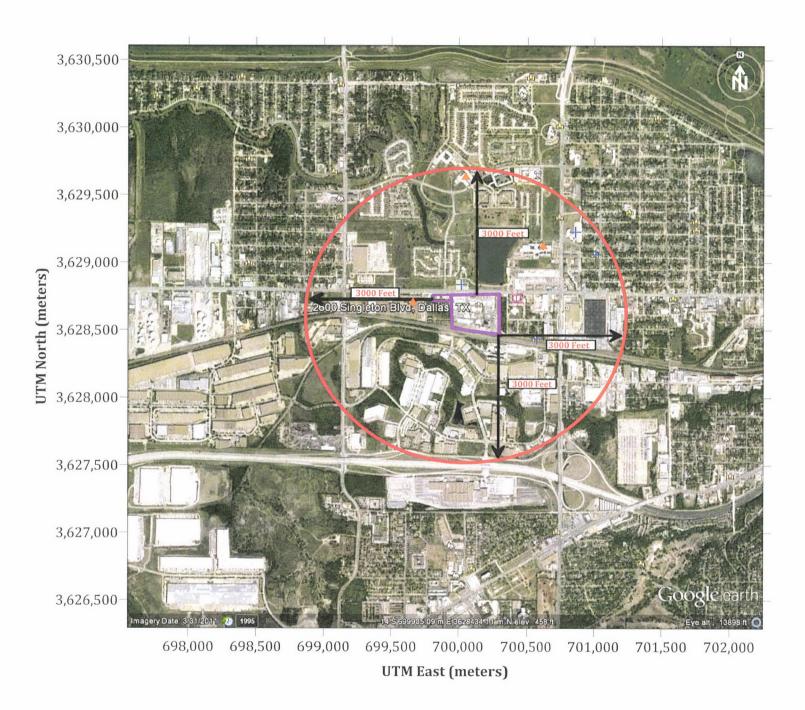
40 CFR 63 Subpart LLLLL applies plants that are major sources of HAPs which emit or have the potential to emit any single HAP at a rate of 9.07 megagrams (10 tons) or more per year or any combination of HAP at a rate of 22.68 megagrams (25 tons) or more per year. As noted in Section 8.1.7 above, the Dallas Plant currently is an area source of HAPs. Therefore, the Dallas Plant is not subject to 40 CFR 63 Subpart LLLLL.

9.2.3. 40 CFR 63 Subpart AAAAAAA - NESHAP for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing

40 CFR 63 Subpart AAAAAAA applies to an asphalt processing operation and/or asphalt roofing manufacturing operation that is an area source of HAP emissions. The Line 1 and Line 3 Asphalt Operations in the GAF Dallas Plant are subject to 40 CFR Part 63 Subpart AAAAAAA since the Dallas Plant is an area source of HAP emissions. The Dallas Plant will continue to ensure that these asphalt operations meet the requirements in this regulation.

The GAF Dallas Plant is located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas (TCEQ Region 4). An area map is included in this section to graphically depict the location of the GAF Dallas Plant with respect to the surrounding topography. The map depicts the property line with respect to predominant geographic features (such as highways, roads, streams, railroads, etc.).

GAF Materials Corporation Dallas Plant



Reference UTM Coordinates are in NAD83. Map image from Google Earth TM Mapping Service.

Legend

O .				
	Property Line			
A	School			
*	Library			
+	Church			

11. PLOT PLAN

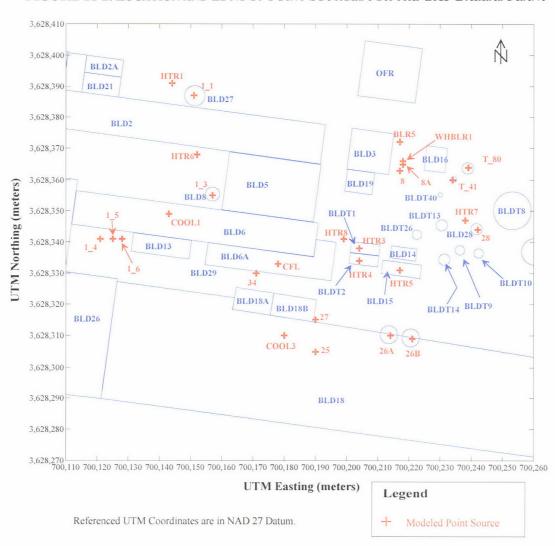
Figure 11-1 provides a detailed plot plan of the Dallas Plant illustrating locations and IDs of building structures. Figure 11-2 provides a detailed plot plan of the Dallas Plant illustrating locations and EPNs of point sources.

3,628,550 BLD11 3,628,500 UTM Northing (meters) BLD31 BLD12 3,628,450 Property Line -BLD21A BLD2B 3,628,400 BLD29 3,628,350 BLD26 3,628,300 BLDT14 BLD18 699,850 699,900 699,950 700,000 700,050 700,100 700,150 700,250 700,300 700,200 700,350 **UTM Easting (meters)**

FIGURE 11-1. LOCATION AND IDS OF BUILDING STRUCTURES FOR THE GAF DALLAS PLANT

Referenced UTM Coordinates are in NAD 27 Datum.

FIGURE 11-2. LOCATION AND EPNS OF POINT SOURCES FOR THE GAF DALLAS PLANT



APPENDIX A - PERMIT NUMBER 7711A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY AIR QUALITY PERMIT



A Permit Is Hereby Issued To
Building Materials Corporation of America
Authorizing the Construction and Operation of
Asphalt Roofing Production Facility
Located at Dallas, Dallas County, Texas
Latitude 32° 46′ 40″ Longitude -96° 51′ 48″



Permit: 77

Amendment Date : .	June 14, 2013

Renewal Date: October 21, 2014

For the Commission

- 1. Facilities covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code 116.116 (30 TAC 116.116)]
- 2. Voiding of Permit. A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1)the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC 116.120(a), (b) and (c)]
- 3. **Construction Progress**. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC 116.115(b)(2)(A)]
- 4. **Start-up Notification**. The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC 116.115(b)(2)(B)(iii)]
- 5. Sampling Requirements. If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC 116.115(b)(2)(C)]

- 6. Equivalency of Methods. The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC 116.115(b)(2)(D)]
- 7. Recordkeeping. The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC 116.115(b)(2)(E)]

8. Maximum Allowable Emission Rates. The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC 116.115(b)(2)(F)]

- 9. Maintenance of Emission Control. The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with 30 TAC 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC 116.115(b)(2)(G)]
- 10. Compliance with Rules. Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC 116.115(b)(2)(H)]
- 11. This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC 116.110(e)]
- 12. There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC 116.115(c)]
- 13. Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in Texas Health and Safety Code (THSC) 382.003(3) or violate THSC 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
- 14. The permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.

Bryan W. Shaw, Ph.D., Chairman Carlos Rubinstein, Commissioner Toby Baker, Commissioner Zak Covar, Executive Director



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 14, 2013

MR BRUCE DAHLGREN
PLANT MANAGER
BUILDING MATERIALS CORPORATION OF AMERICA
2600 SINGLETON BLVD
DALLAS TX 75212-3738

Re: Permit Amendment Application

Permit Number: 7711A

Asphalt Roofing Production Facility

Dallas, Dallas County

Regulated Entity Number: RN100788959 Customer Reference Number: CN602717464

Account Number: DB-0378-S

Dear Mr. Dahlgren:

This is in response to your letter received September 28, 2012 and your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the proposed amendment to Permit Number 7711A. We understand that you propose to replace a boiler burner with a larger unit and increase its annual hours of operation. We further understand that you are requesting that your permit reflect the review of maintenance, startup, and shutdown emissions. Also, this will acknowledge that your application for the above-referenced amendment is technically complete as of May 24, 2013.

As indicated in Title 30 Texas Administrative Code § 116.116(b) and § 116.160 [30 TAC § 116.116(b) and § 116.160], and based on our review, Permit Number 7711A is hereby amended. This information will be incorporated into the existing permit file. Enclosed are revised special conditions pages, a maximum allowable emission rates (MAERT) table, and a new permit face to replace those currently attached to your permit. We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met.

Planned startup and shutdown for the sources identified on the MAERT have been reviewed and included in the MAERT. Maintenance activities are not authorized by this permit and will need separate authorization, unless the activity can meet the conditions of 30 TAC § 116.119.

Mr. Bruce Dahlgren Page 2 June 14, 2013

Re: Permit Number: 7711A

This amendment will be automatically void upon the occurrence of any of the following, as indicated in 30 TAC § 116.120(a):

- 1. Failure to begin construction of the changes authorized by this amendment within 18 months from the date of this authorization.
- 2. Discontinuance of construction of the changes authorized by this amendment for a period of 18 consecutive months or more.
- 3. Failure to complete the changes authorized by this amendment within a reasonable time.

Upon request, the executive director may grant extensions as allowed in 30 TAC § 116.120(b).

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the **effective date of the approval**. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Joel Stanford at (512) 239-0270 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Mr. Bruce Dahlgren Page 3 June 14, 2013

Re: Permit Number: 7711A

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Michael Wilson, P.E., Director

Michael Der

Air Permits Division

Office of Air

Texas Commission on Environmental Quality

MPW/js

Enclosures

cc: Ms. Latha Kambham, Ph.D, Trinity Consultants, Dallas
Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health
Services, Dallas
Air Section Manager, Region 4 - Fort Worth

Project Number: 183376

Special Conditions

Permit Number 7711A

Emission Limitations

1. This permit authorizes those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission rates and other conditions specified in the table. In addition, this permit authorizes all emissions from planned startup and shutdown activities associated with facilities or groups of facilities that are authorized by this permit. (06/13)

Fuel Specifications

- 2. Fuel for the facilities shall be pipeline-quality, sweet natural gas. Use of any other fuel shall require prior written approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ). (08/10)
- 3. Upon request by the Executive Director of the TCEQ, the TCEQ Regional Director, or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel utilized in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis. (08/10)

Federal Applicability

- 4. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources in Title 40 Code of Federal Regulations (40 CFR) Part 60 promulgated for Asphalt Processing and Asphalt Roofing Manufacture in Subpart UU, for Small Industrial-Commercial-Institutional Steam Generating Units in Subpart Dc, and with the General Provisions set forth in Subpart A. (08/10)
- 5. These facilities shall comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants for Area Sources in 40 CFR Part 63 promulgated for Asphalt Processing and Asphalt Roofing Manufacture, Subparts A and AAAAAA. (08/10)

Opacity/Visible Emission Limitations

6. Opacity of particulate matter emissions from the Coalescing Filter Mist Systems (Emission Point No. [EPN] CFL/34), and the Electrostatic Precipitator (EPN CFL/34) (when used as a back-up control device for the filter mist systems), dust collector stacks, baghouse stacks, process heater vents, and building vents shall not exceed 5 percent. Determination of compliance with this requirement shall be made by first observing for visible emissions during normal plant operations. Observations shall be made at least 15 feet and no more than 0.25 mile from the emission point. If visible emissions are observed from the emission point, opacity shall be determined using the EPA 40 CFR Part 60, Appendix A,

Special Conditions Permit Number 7711A Page 2

Test Method 9. Contributions from uncombined water vapor shall not be included in determining compliance with this condition. Determination of compliance with this requirement shall be performed and the results recorded quarterly. **(06/13)**

- 7. Opacity of particulate matter emissions from any asphalt storage tank exhaust gases discharged into the atmosphere shall not exceed o percent except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. Opacity of particulate matter emissions from any blowing still shall not exceed 0 percent. Opacity of emissions from any storage silo and mineral handling facility shall not exceed 1 percent. Determination of compliance with this requirement shall be made by first observing for visible emissions during normal plant operations. Observations shall be made at least 15 feet and no more than 0.25 mile from the emission point. If visible emissions are observed from the emission point, opacity shall be determined using the EPA 40 CFR Part 60, Appendix A, Test Method 9. Contributions from uncombined water vapor shall not be included in determining compliance with this condition. Determination of compliance with this requirement shall be performed and the results recorded quarterly. (06/13)
- 8. There shall be no visible fugitive emissions leaving the property from emissions from the asphalt processing and asphalt roofing manufacturing operations and facilities, roads, or travel areas. Observations for visible emissions shall be performed and recorded quarterly. The visible emissions determination shall be made during normal plant operations. Observations shall be made on the downwind property line for a minimum of six minutes. If visible emissions are observed, an evaluation must be accomplished in accordance with the EPA 40 CFR Part 60, Appendix A, Test Method 22, using the criteria that visible emissions shall not exceed a cumulative 30 seconds in duration in any sixminute period. If visible emissions exceed the Test Method 22 criteria, corrective action to eliminate the excessive visible emissions shall be taken promptly and documented within 24 business hours of first observing the visible emissions. Stack emissions may leave the plant property provided that opacity restrictions are not violated. (06/13)

Operational Limitations, Work Practices, and Plant Design

- 9. All filler and backing material shall be received and transferred within the building with no visible emissions leaving the building. (08/10)
- 10. The emissions from Stillyard Asphalt Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120; from Blowing Stills T-13 and T-26; from truck and railcar loading and unloading operations; and from the self-seal asphalt storage tank shall be vented to the thermal oxidizer (direct-flame incinerator). (08/10)
- 11. Fabric filter baghouses, properly installed and in good working order, shall control particulate matter emissions from the Stabilizer Storages, Stabilizer Heaters, the Line 1 Stabilizer Use Bin, and Sand Application when this equipment is in operation. (06/13)

- Dust collectors, properly installed and in good working order, shall control particulate matter emissions from the Line 1 Surfacing Section when this equipment is in operation. (06/13)
- 13. Upon issuance of the amended permit, the thermal oxidizer (direct-flame incinerator) shall be operated at an average incineration temperature of 1450°F measured immediately downstream of the incinerator, based on a one-hour averaging period, during normal operations. Normal operations are herein defined as any time period when asphalt blowing is occurring, and emissions from the blowing are vented to the direct-flame incinerator. The direct-flame incinerator shall be operated at a minimum incineration temperature of 1300°F during Standby Operating Conditions to assure compliance with the maximum allowable emission rates table (MAERT) limits for volatile organic compounds (VOC) from EPN 8/8A. Standby operating conditions are herein defined as when no process blowers are in operation on any blowing still venting to the direct-flame incinerator. (08/10)
- 14. After issuance of the amended permit, the permit holder is allowed to conduct stack sampling of the thermal oxidizer (direct-flame incinerator) during normal operations at an average temperature lower than 1450°F to demonstrate compliance with the MAERT limits for VOC from EPN 8/8A. Upon demonstration of compliance with the MAERT limits for VOC, the permit holder shall submit a permit action to modify the temperature requirement of the thermal oxidizer (direct-flame incinerator) during Normal Operations. (08/10)
- 15. The maximum allowable asphalt throughput rates are 32,063 pounds per hour for Line 1 and 53,438 pounds per hour for Line 3. **(08/10)**
- 16. The maximum allowable production rates for both Line 1 and Line 3, combined, are 171 tons per hour and 1,498,000 tons per year of finished shingles. (08/10)
- 17. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.
- 18. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations. Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible PM emissions to maintain compliance with all TCEQ rules and regulations.
- 19. All stacks associated with the Line 1 Cooling Section (EPN COOL1) shall be no less than 64 feet measured from ground level. All stacks associated with the Line 3 Cooling Section (EPN COOL3) shall be no less than 73 feet measured from ground level. (08/10)
- There shall be no changes in representations unless the permit is altered or amended. (08/10)

Special Conditions Permit Number 7711A Page 4

Continuous Determination of Compliance

- 21. Upon being informed by the TCEQ Executive Director that the staff has documented visible emissions that exceed the specified opacity limits, the holder of this permit may be required to conduct stack sampling analyses or other tests to prove satisfactory abatement or process equipment performance and demonstrate compliance with the PM and VOC allowable emissions specified in the MAERT. Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with applicable EPA CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling. (08/10)
- 22. The TCEQ Executive Director may require the permit holder to perform stack sampling or ambient air monitoring to determine the opacity, rate, composition, and/or concentration of the plant's emissions. The holder of this permit may request the TCEQ Executive Director to approve alternate sampling techniques or other means to determine the opacity, rates, composition, and/or concentration of emissions in accordance with 30 TAC § 101.8. (08/10)
- 23. All stack sampling shall be conducted within 60 days of being informed that testing is required, and it shall meet all requirements specified in the Sampling Requirements section of this permit's special conditions. (08/10)
- For any asphalt storage tank and storage silo and mineral handling facility, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the corresponding opacity limit, the permit holder shall report a deviation. **(08/10)**

Special Conditions Permit Number 7711A Page 5

- For any blowing still, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous performance test to establish the maximum opacity limit), the permit holder shall report a deviation. (08/10)
- 26. The temperature in the combustion chamber or immediately downstream of the combustion chamber of the thermal oxidizer (direct-flame incinerator) shall be measured and recorded four times per hour with an averaging period of one hour. The permit holder shall establish a minimum combustion temperature using the most recent performance test, manufacturer's recommendations, engineering calculations, and/or historical data. The monitoring instrumentation shall be maintained, calibrated, and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation. (08/10)

Compliance Assurance Monitoring

27. The 3-hour average inlet gas temperature for the Coalescing Filter Mist Elimination Systems (Line 1 and Line 3 Asphalt Coaters) with ESP as Backup (EPN CFL/34) shall be maintained within the operating range established as specified in 40 Code of Federal Regulations (40 CFR) § 63.11562(a)(2) and (b)(3). The 3-hour average pressure drop across the device shall be maintained within the approved operating range established as specified in 40 CFR § 63.11562(a)(2) and (b)(3). (06/13)

Sampling Requirements

- 28. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling ports and platforms shall be installed on the exhaust stack according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Executive Director.
- 29. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for continuing compliance demonstrations. If the plant is unable to operate at the maximum rates during compliance testing, then the production/throughput rates or other parameters may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates. (08/10)
- 30. A pretest meeting concerning any required stack sampling and/or ambient air monitoring shall be held with personnel from the appropriate TCEQ Regional Office before the required tests are performed. Air contaminants to be tested for and the test methods to be used shall be determined at this pretest meeting.

The TCEQ Regional Office shall be notified no less than 45 days prior to sampling to schedule a pretest meeting. The notice to the TCEQ Regional Office shall include:

- A. Date for pretest meeting;
- B. Date sampling will occur;
- C. Name of firm conducting sampling;
- D. Type of sampling equipment to be used; and
- E. Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

- 31. Air contaminants to be tested for may include (but are not limited to) PM, CO, SO₂, NO_x, and VOC.
- 32. A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Office shall approve or disapprove of any deviation from specified sampling procedures.
- 33. The sampling report shall include the following: (08/10)

- A. Plant production and throughput rates during tests; and
- B. Thermal oxidizer (direct-flame incinerator) operating temperature during tests.
- 34. Copies of the final sampling report shall be submitted within 30 days after sampling is completed. Sampling reports shall comply with the provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows: (08/10)
 - One copy to the TCEQ Dallas/Fort Worth Regional Office; and One copy to each appropriate local air pollution control program.
- 35. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Air, Air Permits Division.

Recordkeeping Requirements

- 36. In addition to the recordkeeping requirements specified in General Condition No. 7, 40 CFR Part 60, Subparts A, Dc, and UU, and 40 CFR Part 63, Subparts A and AAAAAA, the following records shall be kept and maintained on-site for a rolling 60-month period: (06/13)
 - A. Records of the exhaust gas temperature immediately downstream of the thermal oxidizer (direct-flame incinerator) to demonstrate compliance with 30 TAC § 115.126(1)(A)(i);
 - B. Records of either VOC concentration or mass emission rate of each vent gas stream for the Line 1 and Line 3 Cooling Sections at maximum actual operating conditions to demonstrate compliance with 30 TAC § 115.126(4);
 - C. Hourly asphalt throughput rates for Line 1 and for Line 3;
 - D. Combined Line 1 and Line 3 hourly and annual production rates of finished shingles;
 - E. Records of asphalt stored and used, that have the potential to emit Hazardous Air Pollutants [HAP], shall be kept in sufficient detail in order to allow all required emission rates to be fully and accurately calculated. Using this recorded data, a report shall be produced for the emission of HAPs (in tons per year) over the previous 12 consecutive months;
 - F. Records of repairs and maintenance of all pollution abatement equipment;
 - G. Quarterly observations for visible emissions and/or opacity determinations;
 - H. Records of road cleaning, application of road dust control, or road maintenance for dust control; and

Special Conditions	
Permit Number 7711A	
Page 8	

I. All monitoring data and support information as specified in 30 TAC § 122.144.

Dated: June 14, 2013

Permit Number 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No.	Source Name (2)	Air Contaminant Name	Emission Rates (5)		
(1)	Source Name (2)	(3)	lbs/hour	TPY (4)	
Stillyard Operation		<u> </u>		<u></u>	
HTR3	T-1 Laminating Adhesive Bulk	NO _x	0.05	0.22	
	Storage Tank Heater Vent	SO ₂	0.01	0.01	
	Vent	PM	0.01	0.02	
		PM ₁₀	0.01	0.02	
		PM _{2.5}	0.01	0.02	
		со	0.04	0.18	
		VOC	0.01	0.01	
HTR4	T-2 Laminating Adhesive Bulk Storage Tank heater Vent	NOx	0.05	0.22	
		SO ₂	0.01	0.01	
		PM	0.01	0.02	
		PM ₁₀	0.01	0.02	
		PM _{2.5}	0.01	0.02	
		СО	0.04	0.18	
		VOC	0.01	0.01	
HTR5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage and Coating Feed Loop Vent	NO _x	0.10	0.43	
		SO ₂	0.01	0.01	
		PM	0.01	0.03	
		PM ₁₀	0.01	0.03	
		PM _{2.5}	0.01	0.03	

Emission Point No	Source Name (2)	Air Contaminant Name	Emission Rates (5)		
(1)	Source Name (2)	(3)	lbs/hour	TPY (4)	
HTR5	Asphalt Heater for T-14 and T-15	СО	0.08	0.36	
	Coating Asphalt Storage and Coating Feed Loop Vent	VOC	0.01	0.02	
BLR5	Standby Boiler Vent	NO _x	0.82	3.59	
		SO_2	0.01	0.04	
		PM	0.16	0.70	
		PM ₁₀	0.16	0.70	
		PM _{2.5}	0.16	0.70	
		со	1.73	7.58	
		voc	0.11	0.48	
8/8A	Thermal Oxidizer (Direct Flame Incinerator) Exhaust through Waste Heat Boiler Stack	NO _x	1.90	8.31	
		SO ₂	29.35	128.55	
		PM	2.62	11.46	
		PM ₁₀	2.62	11.46	
		PM _{2.5}	2.62	11.46	
		со	11.34	49.65	
		voc	0.09	0.37	
WHBLR1	Waste Heat Recovery Boiler Natural Gas Burner Side Vent	NO _x	0.47	2.06	
		SO ₂	0.01	0.04	
		PM	0.11	0.48	
		PM ₁₀	0.11	0.48	
		PM _{2.5}	0.11	0.48	
		СО	1.24	5.43	
		voc	0.08	0.35	

Emission Point No.	G N (a)	Air Contaminant Name	Emission Rates (5)		
(1)	Source Name (2)	(3)	lbs/hour	TPY (4)	
Common to Line 1 a	nd Line 3				
CFL/34	Coalescing Filter Mist Elimination	PM	0.63	2.76	
	Systems (Line 1 and Line 3 Asphalt	PM ₁₀	0.63	2.76	
	Coaters) with ESP as Backup (Stack)	PM _{2.5}	0.63	2.76	
	Suchup (Studie)	VOC	5.76	25.23	
Line 1 Operation					
1-1	Line 1 Stabilizer Storage and Heater	PM	0.23	1.01	
	Baghouse Stack	PM ₁₀	0.23	1.01	
		PM _{2.5}	0.23	1.01	
1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM	0.03	0.13	
		PM ₁₀	0.03	0.13	
		PM _{2.5}	0.03	0.13	
1-4	Line 1 Surfacing Section Dust Collector No. 1 Stack	PM	0.59	2.58	
		PM ₁₀	0.59	2.58	
		PM _{2.5}	0.59	2.58	
1-5	Line 1 Surfacing Section Dust Collector No. 2 Stack	PM	0.59	2.58	
		PM ₁₀	0.59	2.58	
		$PM_{2.5}$	0.59	2.58	
1-6	Line 1 Surfacing Section Dust	PM	0.59	2.58	
	Collector No. 3 Stack	PM ₁₀	0.59	2.58	
		PM _{2.5}	0.59	2.58	
Cool 1	Line 1 Cooling Section (3 stacks)	PM	8.52	37.30	
	(0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	PM ₁₀	8.52	37.30	

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)		
			lbs/hour	TPY (4)	
Cool 1	Line 1 Cooling Section (3 stacks)	PM _{2.5}	8.52	37.30	
	Section (3 stacks)	VOC	1.65	7.23	
Line 3 Operation			****	•	
25	Sand Application Baghouse Stack	PM	1.50	6.57	
	Bugnouse Stack	PM ₁₀	1.50	6.57	
		$PM_{2.5}$	1.50	6.57	
26A	Stabilizer Storage Baghouse A Stack	PM	0.15	0.70	
	Buginouse II otuek	PM ₁₀	0.15	0.70	
		PM _{2.5}	0.15	0.70	
26B	Stabilizer Storage Baghouse B Stack	PM	0.29	1.26	
		PM ₁₀	0.29	1.26	
		PM _{2.5}	0.29	1.26	
27	Stabilizer Heater Baghouse Stack	PM	0.09	0.40	
		PM ₁₀	0.09	0.40	
		PM _{2.5}	0.09	0.40	
28	Asphalt Heater Vent	NOx	0.59	2.60	
		SO ₂	<0.01	0.02	
		PM	0.04	0.20	
		PM ₁₀	0.04	0.20	
		PM _{2.5}	0.04	0.20	
		СО	0.50	2.20	
		VOC	0.03	0.10	

Emission Point No.	Source Name (2)	Air Contaminant Name	Emission Rates (5)		
(1)		(3)	lbs/hour	TPY (4)	
FUG1	Plant-wide Fugitive Emissions	PM	0.91	3.97	
	Emissions	PM ₁₀	0.91	3.97	
		PM _{2.5}	0.91	3.97	
		voc	0.43	1.88	
COOL3	Line 3 Cooling Section (3 stacks)	PM	6.74	29.52	
	section (3 stacks)	PM ₁₀	6.74	29.52	
		PM _{2.5}	6.74	29.52	
		voc	2.76	12.09	
HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO _x	0.60	2.58	
		SO ₂	0.01	0.02	
		PM	0.05	0.20	
		PM ₁₀	0.05	0.20	
		PM _{2.5}	0.05	0.20	
		СО	0.49	2.16	
		voc	0.03	0.14	
All Source (site-wide)	Various	Single HAP		<10	
		Aggregate HAP		<25	

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

NO_x - total oxides of nitrogen SO₂ - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$, as

represented

 PM_{10} - total particulate matter equal to or less than 10 microns in diameter, including $PM_{2.5}$, as represented

 $PM_{2.5}$ - particulate matter equal to or less than 2.5 microns in diameter

CO - carbon monoxide

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Emission Sources - Maximum Allowable Emission Rates

(4) Cor	npliance with a	nnual emission lim	ts (tons per year) is based on a :	12 month rolling period.
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(5) Planned startup and shutdown emissions are included. Maintenance activities are not authorized by this permit.

Dated: June 14, 2013

§116.119. De Minimis Facilities or Sources.

- (a) Facilities or sources that meet the conditions of one or more of the paragraphs of this subsection are considered by the commission to be de minimis, which means that registration or authorization prior to construction is not required:
 - (1) categories of facilities or sources included on the list entitled "De Minimis Facilities or Sources";
 - (2) facilities or sources at a site which, in combination, use the following materials at no more than the rate prescribed in subparagraphs (A) (F) of this paragraph:
 - (A) cleaning and stripping solvents, 50 gallons per year;
 - (B) coatings (excluding plating materials), 100 gallons per year;
 - (C) dyes, 1,000 pounds per year;
 - (D) bleaches, 1,000 gallons per year;
 - (E) fragrances (excluding odorants), 250 gallons per year;
 - (F) water-based surfactants/detergents, 2,500 gallons per year;
 - (3) facilities or sources located inside a building at a site which meet the following sitewide emission rate caps based on the July 19, 2000 Effects Screening Levels (ESL) list without the addition of control devices, as defined in §101.1 of this title (relating to Definitions).

ESL of Substance(s)	Emission Rate C Individual Subst		Emission Rate C Multiple Substar	
(µg/m³)	(pounds/day)	(tons/year)	(pounds/day)	(tons/year)
≥3500	5	0.9	10	2.4
1200-3499	3	0.5	6	1.3
400-1199	1	0.2	3	0.5
100-399	0.25	0.05	1	0.2

- (4) any individual facility, source, or group of facilities or sources which the executive director determines to be de minimis based upon:
 - (A) proximity to receptors;
 - (B) rate of emission of air contaminants:
 - (C) engineering judgment and experience; and
 - (D) determination that no adverse toxicological or health effects would occur off property.

- (b) De minimis facilities or sources at a site which are subsequently determined by the executive director to be in violation of any commission rule, permit, order, or statute within the commission's jurisdiction, will no longer be considered de minimis and must obtain registration or authorization under this chapter or Chapter 106 of this title (relating to Permits by Rule).
- (c) The "List of De Minimis Facilities or Sources" will be maintained in the commission's Office of Permitting, Remediation, and Registration in Austin, with copies maintained in the commission's regional offices, and on the commission's home page on the World Wide Web.
 - (1) Persons may petition the executive director to amend the "List of De Minimis Facilities or Sources" or the executive director may amend the list as necessary.
 - (2) When amending the list to add or delete categories of facilities, sources, or groups of facilities or sources, the executive director will consider, at a minimum, the following:
 - (A) typical operating scenarios;
 - (B) typical design and location;
 - (C) the types and rates of air contaminants emitted;
 - (D) engineering judgment and experience; and
 - (E) toxicological or health impacts.
 - (3) When amending the list to add or delete categories of facilities, sources, or groups of facilities or sources, the executive director will publish notice of the proposed amendment on the commission's home page on the World Wide Web and will allow 30 days for comments. If a category of facilities, sources, or groups of facilities or sources is deleted from the list, the owner or operator will have 180 days from the date of publication of the amended list on the commission's home page on the World Wide Web to obtain, register, or apply for authorization under this chapter or Chapter 106 of this title (relating to Permits by Rule).

Effective September 4, 2000



Form OP-CRO₁

Certification by Responsible Official

Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I.	IDENTIFYING INFORMA	TION				
RN:	100223585	CN: 603159088			Account No.: ED-00	51-O
Pern	nit No.: O-01094		Project No	o.: TBA		
Area	Name: Waxahachie Plant		Company	Name: Owe	ens Corning Insulating Sys	stems, LLC
II.	CERTIFICATION TYPE (F	lease mark the a	ppropriate	e box)		
□R	esponsible Official		⊠ Duly	Authorized	d Representative	
III.	SUBMITTAL TYPE (Please	mark the appro	priate box)) (Only one	response can be acc	epted per form
□ s	OP/TOP Initial Permit Applica	tion 🔲 Upda	te to Permi	t Applicati	on	
□G	OP Initial Permit Application	Perm:	it Revision,	, Renewal,	or Reopening	
⊠o	ther: Operational Flexibil	ity Notificatior	າ			
IV.	CERTIFICATION OF TRU	ТН				
info	s certification does not extermation for reference only Breg Bowling	y.) as
1, <u> </u>	(Certifier Name printe	d or tuned)	cer	tiry that I a	om the DAR (RO or 1	\overline{DAR})
date Note	that, based on information and d during the time period or on e: Enter EITHER a Time Perion pleted. The certification is not	the specific date(d OR Specific Da	s) below, a te(s) for ea	re true, acc ach certifica	curate, and complete	:
Time	e Period: From	Start Date	to			
	\$	Start Date			End Date	
Spec	ific Dates: 01/22/2014					
	Date 1	Date 2	Date 3	Date 4	Date5	Date 6
	ature:			Signat	ure Date:	
 Title	: Plant Leader					



Texas Commission on Environmental Quality Federal Operating Permit Program Notification of Off-Permit/Operational Flexibility Action Form OP-NOTIFY

Date: 01/22/2014	Company Name: Owens Corning Insulating Systems, LLC
Site Name: Waxahachie Plant	Permit No.: O-01094

Action Type	Date of Change	Emission Units Affected	Description of Change (Include deletions/additions in: amount of emissions, types of pollutants emitted, and/or applicable requirements)
OPFLEX	Pending*	6 and 21	A permit alteration letter was submitted to request an update of Special Condition 11 in Permit No. 6093. There
			are no changes in emissions.

* TCEQ permit alteration approval date